INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: October 16, 2007

RE: Ferro Corporation / 099-18688-00025

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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

Enclosures
FNTVOP.dot 03/23/06

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Indianapolis, Indiana 46204-2251
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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Ferro Corporation
1301 North Flora Street
Plymouth, Indiana 46563

(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.: T099-18688-00025	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 16, 2007 Expiration Date: October 16, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a manufacturing plant for the production of liquid coatings and dispersions.

Source Address:	1301 North Flora Street, Plymouth, IN 46563
Mailing Address:	1301 North Flora Street, Plymouth, IN 46563
General Source Phone Number:	574-935-5131
SIC Code:	3087
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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) Nineteen (19) mixers, consisting of:

(1) one (1) mixer, identified as M1 and constructed in 1969, with a maximum unit capacity of 3,800 pounds of raw material for gelcoat and cordobond production per batch, exhausting out of the building through exhaust fan EF 16,

(2) one (1) mixer, identified as M2 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(3) one (1) mixer, identified as M3 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(4) one (1) mixer, identified as M4 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(5) one (1) mixer, identified as M5 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat, liquid paste, and cordobond production per batch, exhausting out of the building through exhaust fan EF 13,

(6) one (1) mixer, identified as M6 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 13,

(7) one (1) mixer, identified as M7 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting within the building,

(8) one (1) mixer, identified as M8 and constructed in 1969, with a maximum unit capacity of 6,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 16,

(9) one (1) mixer, identified as M9 and constructed in 1969, with a maximum unit capacity of 7,800 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 12,

(10) one (1) mixer, identified as M10 and constructed in 1995, with a maximum unit capacity of 11,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 11,

(11) one (1) mixer, identified as M11 and constructed in 1995, with a maximum unit capacity of 5,000 pounds of raw material for gelcoat and liquid paste production per batch, utilizing baghouse G5 for particulate control, exhausting within the building,

(12) one (1) mixer, identified as M12 and constructed in 1995, with a maximum unit capacity of 4,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(13) one (1) mixer, identified as M13 and constructed in 1995, with a maximum unit capacity of 1,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(14) one (1) mixer, identified as M14 and constructed in 1995, with a maximum unit capacity of 500 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(15) one (1) mixer, identified as M15 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,

(16) one (1) mixer, identified as M16 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,

(17) one (1) mixer, identified as M17 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(18) one (1) mixer, identified as M18 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building, and

(19) one (1) mixer, identified as M20 and constructed in 2003, with a maximum unit capacity of 3,500 pounds of raw material for gel coat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 9.

Under NESHAP Subpart HHHHH, mixers M1 through M18 and M20 are each considered an existing affected source.

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) A laboratory as defined in 326 IAC 2-7-1(21)(D), consisting of:
  (1) one (1) Q/C gelcoat spraybooth, exhausting to stack EF 20, utilizing dry filters as particulate control [326 IAC 6-3-2(d)], and
  (2) two (2) Q/C lab drill presses [326 IAC 6-3-2].

(b) Two (2) portable mixers, blenders with unit capacities of 100 pounds per hour, for dry color production, [326 IAC 6-3-2]

(c) Three (3) Roll Mill/Lab Mills for gelcoat and liquid paste,
  (1) one (1) 3-Roll Mill/Lab Mill, identified as RM2 with a maximum unit capacity of 0.75 hp, exhausting outside of the building through exhaust fan EF 14 [326 IAC 6-3-2],
  (2) one (1) 3-Roll Mill, identified as RM3, exhausting outside of the building through exhaust fan EF 14 [326 IAC 6-3-2], and
  (3) one (1) 3-Roll Mill, identified as RM4, exhausting outside of the building through exhaust fan EF 14 [326 IAC 6-3-2].

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T099-18688-00025, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

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

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

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

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

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

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

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

Telephone Number: (574) 245-4870 (North Regional Office)
Facsimile Number: (574) 245-4877

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

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

and

Northern Regional Office
220 W. Colfax Ave., Ste 200
South Bend, IN 46601-1634

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more

than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T099-18688-00025 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

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

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

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

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

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

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

(1) That this permit contains a material mistake.

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

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

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

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

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

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

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

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

received by IDEM, OAQ, on or before the date it is due.

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

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

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

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

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

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

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

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

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

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

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

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

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

(4) The Permittee notifies the:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

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

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

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

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

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

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

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

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the

request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

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

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

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

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

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 3, 1996.

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

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

(1) initial inspection and evaluation;

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

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

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may

include, but is not limited to, the following:

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

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

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

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

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

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

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

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

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 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
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

is due.

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) Nineteen (19) mixers, consisting of:

(1) one (1) mixer, identified as M1 and constructed in 1969, with a maximum unit capacity of 3,800 pounds of raw material for gelcoat and cordobond production per batch, exhausting of the building through exhaust fan EF 16,

(2) one (1) mixer, identified as M2 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(3) one (1) mixer, identified as M3 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(4) one (1) mixer, identified as M4 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(5) one (1) mixer, identified as M5 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat, liquid paste, and cordobond production per batch, exhausting out of the building through exhaust fan EF 13,

(6) one (1) mixer, identified as M6 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 13,

(7) one (1) mixer, identified as M7 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting within the building,

(8) one (1) mixer, identified as M8 and constructed in 1969, with a maximum unit capacity of 6,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 16,

(9) one (1) mixer, identified as M9 and constructed in 1969, with a maximum unit capacity of 7,800 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 12,

(10) one (1) mixer, identified as M10 and constructed in 1995, with a maximum unit capacity of 11,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 11,

(11) one (1) mixer, identified as M11 and constructed in 1995, with a maximum unit capacity of 5,000 pounds of raw material for gelcoat and liquid paste production per batch, utilizing baghouse G5 for particulate control, exhausting within the building,

(12) one (1) mixer, identified as M12 and constructed in 1995, with a maximum unit capacity of 4,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(13) one (1) mixer, identified as M13 and constructed in 1995, with a maximum unit capacity of 1,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(14) one (1) mixer, identified as M14 and constructed in 1995, with a maximum unit capacity of 500 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(15) one (1) mixer, identified as M15 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,

(16) one (1) mixer, identified as M16 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,

(17) one (1) mixer, identified as M17 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(18) one (1) mixer, identified as M18 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building, and

(19) one (1) mixer, identified as M20 and constructed in 2003, with a maximum unit capacity of 3,500 pounds of raw material for gel coat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 9.

Under NESHAP Subpart HHHHH, mixers M1 through M18 and M20 are each considered an existing affected source.

(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 PSD Minor Limit [326 IAC 2-2]

The total amount of VOC input to Mixers M1 through M18 and M20, including polyester gelcoats, pastes, and cordobond, shall be limited to less than 248.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, based upon the following:

(a) The amount of gelcoat produced shall be less than 14,023.4 tons per 12 consecutive month period with compliance determined at the end of each month.

(b) The VOC emission rate from the gelcoats produced at Mixers M1 through M18 and M20 shall not exceed 0.015 pound of VOC per pound of gelcoat produced.

(c) The amount of liquid paste produced shall be less than 27,489.3 tons per 12 consecutive month period with compliance determined at the end of each month.

(d) The VOC emission rate from the liquid paste produced at Mixers M1 through M18 and M20 shall not exceed 0.0001 pound of VOC per pound of liquid paste produced.

(e) The amount of cordobond produced shall be less that 1,790 tons per 12 consecutive month period with compliance determined at the end of each month.

(f) The VOC emission rate from the cordobond produced at Mixers M1 through M18 and M20 shall not exceed 0.02 pound of VOC per pound of cordobond produced.

Compliance with the throughput and emission limits will limit source-wide emissions to less than 250 tons per year and shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to CP 099-4443-00025, issued October 30, 1995, and 326 IAC 8-1-6 (General Reduction Requirements), the Best Available Control Technology (BACT) for the manufacture of polyester gelcoats in Mixers M10 and M11, shall be as follows:

Mixers M10 and M11 shall be configured and operated as follows:

(1) The exhaust vent shall be positioned in near proximity to the lip of each mixer, but not located on or over the mixer lid, such that VOC vaporization during product mixing is minimized; and

(2) The mixer lids shall be in place when mixing, except during raw material transfer to each mixer, sampling, and product removal from each mixer.

Compliance with this condition will satisfy the Best Available Control Technology (BACT) requirement of 326 IAC 8-1-6, pursuant to CP 099-4443-00025, issued October 30, 1995.

(b) The amount of gelcoat produced at Mixer M20 shall be limited to less than 1,666 tons per twelve (12) consecutive month period with compliance determined at the end of each month and the VOC emission rate shall be limited to 0.015 pound of VOC per pound of gelcoat produced such that the potential to emit (PTE) of VOC shall be limited to less than 25 tons per twelve (12) consecutive months. Compliance with these limits shall make the requirements of 326 IAC 8-1-6 not applicable.

D.1.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter emissions from the blending operation shall be limited as shown below:

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Mixer M1	1.90	6.30
Mixer M2	1.60	5.62
Mixer M3	0.25	1.62
Mixer M4	0.25	1.62
Mixer M5	1.00	4.10
Mixer M6	1.00	4.10
Mixer M7	1.60	5.62
Mixer M8	3.00	8.56
Mixer M9	3.90	10.20
Mixer M10	5.50	12.85
Mixer M11	2.50	7.58
Mixer M12	2.00	6.52
Mixer M13	0.50	2.58
Mixer M14	0.25	1.62
Mixer M15	1.50	5.38
Mixer M16	2.50	7.58
Mixer M17	2.50	7.58
Mixer M18	1.50	5.38
Mixer M20	1.75	5.97

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

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Particulate Control

The baghouses for particulate control shall be in operation and control emissions from the M11, M12, M16 and M17 at all times that the mixers are in operation.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with condition D.1.1 shall be determined based on the following equation:

VOC emissions = (amount of gelcoat production) x (VOC emission rate for 0.015 pound of VOC per pound of gelcoat produced) + (amount of liquid paste production) x (VOC emission rate for 0.0001 pound of VOC per pound of liquid paste produced) + (amount of cordobond production) x (VOC emission rate for 0.02 pound of VOC per pound of cordobond produced)

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days after the issuance of this permit, the Permittee shall perform VOC testing on representative mixers M1 (cordobond), M11 (gel coat) and M16 (liquid paste), using methods as approved by the Commissioner, in order to demonstrate compliance with Condition D.1.1. The test on Mixers M1, M11 and M16 shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. The Office of Air Quality has determined that testing should be performed on Mixers M1, M11 and M16 to demonstrate compliance with the emission limits in Condition D.1.1. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.8 Visible Emissions Notations

(a) Daily visible emission notations of the mixers M11, M12, M16, and M17 stack exhausts shall be performed during normal daylight operations. 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.9 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the mixers M11, M12, M16, and M17, at least once per day when the processes are in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. 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 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.10 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each product manufactures and solvent used.

(2) The amount of raw material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to the products and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of mixers M11, M12, M16, and M17 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(c) To document compliance with Condition D.1.9, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATIONS CONDITIONS

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

(a) A laboratory as defined in 326 IAC 2-7-1(21)(D), consisting of:
  (1) one (1) Q/C gelcoat spraybooth, exhausting to stack EF 20, utilizing dry filters as particulate control [326 IAC 6-3-2(d)], and
  (2) two (2) Q/C lab drill presses [326 IAC 6-3-2].

(b) Two (2) portable mixers, blenders with unit capacities of 100 pounds per hour, for dry color production, [326 IAC 6-3-2]

(c) Three (3) Roll Mill/Lab Mills for gelcoat and liquid paste,
  (1) one (1) 3-Roll Mill/Lab Mill, identified as RM2 with a maximum unit capacity of 0.75 hp, exhausting outside of the building through exhaust fan EF 14 [326 IAC 6-3-2],
  (2) one (1) 3-Roll Mill, identified as RM3, exhausting outside of the building through exhaust fan EF 14 [326 IAC 6-3-2], and
  (3) one (1) 3-Roll Mill, identified as RM4, exhausting outside of the building through exhaust fan EF 14[326 IAC 6-3-2]

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

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

D.2.1 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) Q/C gelcoat spraybooth shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.2 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Process), the allowable particulate matter emissions from the two (2) portable mixers shall be limited as shown below:

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Portable Mixer 1	0.05	0.551
Portable Mixer 2	0.05	0.551

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Process), the allowable particulate emission rate from each of the Q/C lab drill presses and the three (3) Roll Mill/Lab Mills (RM2, RM3 and RM4) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

SECTION E.1 FACILITY OPERATION CONDITIONS

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

(a) Nineteen (19) mixers, consisting of:

(1) one (1) mixer, identified as M1 and constructed in 1969, with a maximum unit capacity of 3,800 pounds of raw material for gelcoat and cordobond production per batch, exhausting of the building through exhaust fan EF 16,
(2) one (1) mixer, identified as M2 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,
(3) one (1) mixer, identified as M3 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,
(4) one (1) mixer, identified as M4 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,
(5) one (1) mixer, identified as M5 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat, liquid paste, and cordobond production per batch, exhausting out of the building through exhaust fan EF 13,
(6) one (1) mixer, identified as M6 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 13,
(7) one (1) mixer, identified as M7 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting within the building,
(8) one (1) mixer, identified as M8 and constructed in 1969, with a maximum unit capacity of 6,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 16,
(9) one (1) mixer, identified as M9 and constructed in 1969, with a maximum unit capacity of 7,800 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 12,
(10) one (1) mixer, identified as M10 and constructed in 1995, with a maximum unit capacity of 11,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 11,
(11) one (1) mixer, identified as M11 and constructed in 1995, with a maximum unit capacity of 5,000 pounds of raw material for gelcoat and liquid paste production per batch, utilizing baghouse G5 for particulate control, exhausting within the building,
(12) one (1) mixer, identified as M12 and constructed in 1995, with a maximum unit capacity of 4,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,
(13) one (1) mixer, identified as M13 and constructed in 1995, with a maximum unit capacity of 1,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,
(14) one (1) mixer, identified as M14 and constructed in 1995, with a maximum unit capacity of 500 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,
(15) one (1) mixer, identified as M15 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,
(16) one (1) mixer, identified as M16 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,
(17) One (1) mixer, identified as M17 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,
(18) one (1) mixer, identified as M18 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building, and

SECTION E.1 Cont'd FACILITY OPERATION CONDITIONS

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

(19) One (1) mixer, identified as M20 and constructed in 2003, with a maximum unit capacity of 3,500 pounds of raw material for gel coat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 9.

Under NESHAP Subpart HHHHH, mixers M1 through M18 and M20 are each considered an existing affected source.

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

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

E.1.1 General Provisions Relating to NESHAP Subpart HHHHH [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.8095, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 10 of 40 CFR Part 63, Subpart HHHHH in accordance with the schedule in 40 CFR 63, Subpart HHHHH.

E.1.2 NESHAP Subpart HHHHH Requirements [40 CFR Part 63, Subpart HHHHH]

Pursuant to CFR Part 63, Subpart HHHHH, the Permittee shall comply with the provisions of 40 CFR Part 63.7980, as specified as follows:

§ 63.7980 What is the purpose of this subpart?

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous coating manufacturing. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limits, operating limits, and work practice standards.

§ 63.7985 Am I subject to the requirements in this subpart?

(a) You are subject to the requirements in this subpart if you own or operate miscellaneous coating manufacturing operations, as defined in paragraph (b) of this section, that meet the conditions specified in paragraphs (a)(1) through (4) of this section.

(1) Are located at or are part of a major source of hazardous air pollutants (HAP) emissions, as defined in section 112(a) of the Clean Air Act (CAA).

(2) Manufacture coatings as defined in §63.8105.

(3) Process, use, or produce HAP.

(4) Are not part of an affected source under another subpart of this part 63.

(b) Miscellaneous coating manufacturing operations include the facilitywide collection of equipment described in paragraph (b)(1) of this section that is used to manufacture coatings as defined in §63.8105. Miscellaneous coating manufacturing operations also include cleaning operations.

(1) Process vessels.

§ 63.7990 What parts of my plant does this subpart cover?

(a) This subpart applies to each miscellaneous coating manufacturing affected source as defined in §63.7985(a).

(b) The miscellaneous coating manufacturing affected source is the miscellaneous coating manufacturing operations as defined in §63.7985(b).

(c) An affected source is a new affected source if you commenced construction or reconstruction after April 4, 2002, and you met the applicability criteria at the time you commenced construction or reconstruction.

Compliance Dates

§ 63.7995 When do I have to comply with this subpart?

(b) If you have an existing affected source on December 11, 2003, then you must comply with the requirements for existing sources in this subpart no later than December 11, 2006.

(d) You must meet the notification requirements in §63.8070 according to the schedule in §63.8070 and in 40 CFR part 63, subpart A. Some of the notifications must be submitted before you are required to comply with the emission limits, operating limits, and work practice standards in this subpart.

Emission Limits, Work Practice Standards, and Compliance Requirements

§ 63.8000 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limits and work practice standards in Tables 1 through 5 to this subpart at all times, except during periods of startup, shutdown, and malfunction. You must meet the requirements specified in paragraphs (b) and (c) of this section. You must meet the requirements specified in §§63.8005 through 63.8025 (or the alternative means of compliance in §63.8050), except as specified in paragraph (d) of this section. You must meet the notification, reporting, and recordkeeping requirements specified in §§63.8070, 63.8075, and 63.8080.

(b) General requirements. (1) If an emission stream contains halogen atoms, and you use a combustion-based control device (excluding a flare) to meet an organic HAP emission limit, you must determine whether the emission stream meets the definition of a halogenated stream by calculating the concentration of each organic compound that contains halogen atoms using the procedures specified in §63.115(d)(2)(v), multiplying each concentration by the number of halogen atoms in the organic compound, and summing the resulting halogen atom concentrations for all of the organic compounds in the emission stream. Alternatively, you may elect to designate the emission stream as halogenated.

(2) Opening of a safety device, as defined in §63.8105, is allowed at any time conditions require it to avoid unsafe conditions.

(c) Compliance requirements for closed vent systems and control devices. If you use a control device to comply with an emission limit in Table 1, 2, or 5 to this subpart, you must comply with the requirements in subpart SS of 40 CFR part 63 as specified in paragraphs (c)(1) through (3) of this section, except as specified in paragraph (d) of this section.

(1) If you reduce organic HAP emissions by venting emissions through a closed-vent system to any combination of control devices (except a flare), you must meet the requirements of §63.982(c) and the requirements referenced therein.

(3) If you use a halogen reduction device to reduce hydrogen halide and halogen HAP emissions that are generated by combusting halogenated vent streams, you must meet the requirements of §63.994 and the requirements referenced therein. If you use a halogen reduction device before a combustion device, you must determine the halogen atom emission rate prior to the combustion device according to the procedures in §63.115(d)(2)(v).

§ 63.8005 What requirements apply to my process vessels?

(a) General. (1) You must meet each emission limit and work practice standard in Table 1 to this subpart that applies to you, and you must meet each applicable requirement specified in §63.8000(b), except as specified in paragraphs (a)(1)(i) and (ii) of this section.

(i) You are not required to meet the emission limits and work practice standards in Table 1 to this subpart if you comply with §63.8050 or §63.8055.

(ii) You must meet the emission limits and work practice standards in Table 1 to this subpart for emissions from automatic cleaning operations. You are not required to meet the emission limits and work practice standards in Table 1 to this subpart for emissions from cleaning operations that are conducted manually.

(2) For each control device used to comply with Table 1 to this subpart, you must comply with subpart SS of this part 63 as specified in §63.8000(c), except as specified in §63.8000(d) and paragraphs (b) through (g) of this section.

(b) When subpart SS of this part 63 refers to process vents, it means process vessel vents for the purposes of this section.

(c) Process condensers, as defined in §63.1251, are not considered to be control devices for process vessels.

(d) Initial compliance. (1) To demonstrate initial compliance with a percent reduction emission limit in Table 1 to this subpart, you must conduct the performance test or design evaluation under conditions as specified in §63.7(e)(1), except that the performance test or design evaluation must be conducted under worst-case conditions. Also, the performance test for a control device used to control emissions from process vessels must be conducted according to §63.1257(b)(8), including the submittal of a site-specific test plan for approval prior to testing. The requirements in §63.997(e)(1)(i) and (iii) also do not apply for performance tests conducted to determine compliance with the emission limits for process vessels.

(2) For the initial compliance demonstration for condensers, you must determine uncontrolled emissions using the procedures specified in §63.1257(d)(2), and you must determine controlled emissions using the procedures specified in §63.1257(d)(3)(i)(B) and (iii).

(3) You must demonstrate that each process condenser is properly operated according to the procedures specified in §63.1257(d)(2)(i)(C)(4)(ii) and (d)(3)(iii)(B). The reference in §63.1257(d)(3)(iii)(B) to the alternative standard in §63.1254(c) does not apply for the purposes of this subpart. As an alternative to measuring the exhaust gas temperature, as required by §63.1257(d)(3)(iii)(B), you may elect to measure the liquid temperature in the receiver.

(4) You must conduct a performance test or compliance demonstration equivalent to an initial compliance demonstration within 360 hours of a change in operating conditions that are not considered to be within the previously established worst-case conditions.

(e) Establishing operating limits. You must establish operating limits under the conditions required for your initial compliance demonstration, except you may elect to establish operating limit(s) for conditions other than those under which a performance test was conducted as specified in paragraph (e)(1) of this section and, if applicable, paragraph (e)(2) of this section.

(1) The operating limits may be based on the results of the performance test and supplementary information such as engineering assessments and manufacturer's recommendations. These limits may be established for conditions as unique as individual emission episodes. You must provide rationale in the precompliance report for the specific level for each operating limit, including any data and calculations used to develop the limit and a description of why the limit indicates proper operation of the control device. The procedures provided in this paragraph (e)(1) have not been approved by the Administrator and determination of the operating limit using these procedures is subject to review and approval by the Administrator.

(2) If you elect to establish separate operating limits for different emission episodes, you must maintain records as specified in §63.8085(g) of each point at which you change from one operating limit to another, even if the duration of the monitoring for an operating limit is less than 15 minutes.

(f) Averaging periods. If you elect to establish separate operating limits for different emission episodes, you may elect to determine operating block averages instead of the daily averages specified in §63.998(b)(3). An operating block is a period of time that is equal to the time from the beginning to end of an emission episode or sequence of emission episodes.

(g) Flow indicators. If flow to a control device could be intermittent, you must install, calibrate, and operate a flow indicator at the inlet or outlet of the control device to identify periods of no flow. Periods of no flow may not be used in daily or block averages, and it may not be used in fulfilling a minimum data availability requirement.

Notification, Reports, and Records

§ 63.8070 What notifications must I submit and when?

(a) You must submit all of the notifications in §§63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), 63.9(b) through (h) that apply to you by the dates specified.

(b) Initial notification. (1) As specified in §63.9(b)(2), if you have an existing affected source on December 11, 2003, you must submit an initial notification not later than 120 calendar days after December 11, 2003.

(2) As specified in §63.9(b)(3), if you start up your new affected source on or after December 11, 2003, you must submit an initial notification not later than 120 calendar days after you become subject to this subpart.

(c) Notification of performance test. If you are required to conduct a performance test, you must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in §63.7(b)(1). For any performance test required as part of the initial compliance procedures for process vessels in Table 1 to this subpart, you must also submit the test plan required by §63.7(c) and the emission profile with the notification of the performance test.

§ 63.8075 What reports must I submit and when?

(a) You must submit each report in Table 9 to this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report as specified in Table 9 to this subpart and paragraphs (b)(1) and (2) of this section.

(1) The compliance reports must be submitted semiannually. The first report must be submitted no later than 240 days after the applicable compliance date and shall cover the 6-month period beginning on the compliance date. Each subsequent compliance report must cover the 6-month period following the preceding period.

(2) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in Table 9.

(c) Precompliance report. You must submit a precompliance report to request approval of any of the information in paragraphs (c)(1) through (4) of this section. We will either approve or disapprove the report within 90 days after we receive it. If we disapprove the report, you must still be in compliance with the emission limitations and work practice standards in this subpart by the compliance date.

(1) Requests for approval to set operating limits for parameters other than those specified in §§63.8005 through 63.8025, including parameters for enhanced biological treatment units. Alternatively, you may make these requests according to §63.8(f).

(2) Descriptions of daily or per batch demonstrations to verify that control devices subject to §63.8000(d)(3) are operating as designed.

(3) A description of the test conditions, data, calculations, and other information used to establish operating limits according to §63.8005(e)(1).

(d) Notification of compliance status report. You must submit a notification of compliance status report according to the schedule in paragraph (d)(2) of this section, and the notification of compliance status report must include the information specified in paragraph (d)(2) of this section.

(1) You must submit the notification of compliance status report no later than 150 days after the applicable compliance date specified in §63.7995.

(2) The notification of compliance status report must include the information in paragraphs (d)(3)(i) through (vi) of this section.

(i) The results of any applicability determinations (e.g., HAP content of coating products; halogenated vent stream determinations; group determinations for storage tanks, wastewater, and transfer operations; and equipment that is in organic HAP service).

(ii) The results of performance tests, engineering analyses, design evaluations, flare compliance assessments, inspections and repairs, and calculations used to demonstrate initial compliance according to §§63.8005 through 63.8025 and 63.8055. For performance tests, results must include descriptions of sampling and analysis procedures and quality assurance procedures.

(iii) Descriptions of monitoring devices, monitoring frequencies, and the operating limits established during the initial compliance demonstrations, including data and calculations to support the levels you establish.

(iv) Identification of parts of the affected source that are subject to overlapping requirements described in §63.8090 and the authority under which you will comply.

(e) Compliance report. The compliance report must contain the information specified in paragraphs (e)(1) through (8) of this section.

(1) Company name and address.

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

(3) Date of report and beginning and ending dates of the reporting period.

(4) Applicable records and information for periodic reports as specified in referenced subparts F, SS, TT, UU, and WW of this part 63.

(5) For each SSM during which excess emissions occur, the compliance report must include the information specified in paragraphs (e)(5)(i) and (ii) of this section.

(i) Records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP.

(ii) A description of each malfunction.

(6) The compliance report must contain the information on deviations, as defined in §63.8105, according to paragraphs (e)(6)(i), (ii), and (iii) of this section.

(i) If there are no deviations from any emission limit, operating limit, or work practice standard specified in this subpart, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

(ii) For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where you are not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standards in this subpart, you must include the information in paragraphs (e)(6)(ii)(A) through (C) of this section.

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

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

(C) Operating logs for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.

(iii) For each deviation from an emission limit or operating limit occurring at an affected source where you are using a CMS to comply with the emission limit in this subpart, you must include the information in paragraphs (e)(6)(iii)(A) through (K) of this section. This includes periods of SSM.

(A) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

(B) The date, time, and duration that each CEMS was out-of-control, including the information in §63.8(c)(8).

(C) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(D) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.

(E) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(F) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.

(G) An identification of each HAP that is known to be in the emission stream or wastewater stream, as applicable.

(H) A description of the product being produced.

(I) Identification of the CMS.

(J) The date of the latest CMS certification or audit.

(K) The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred.

(8) Notification of process change. (i) Except as specified in paragraph (e)(8)(ii) of this section, whenever you change any of the information submitted in either the notification of compliance status report or any previously reported change to the notification of compliance status report, you must document the change in your compliance report. The notification must include all of the information in paragraphs (e)(8)(i)(A) and (B) of this section.

(A) Revisions to any of the information reported in the original notification of compliance status report under paragraph (d) of this section.

(B) Information required by the notification of compliance status report under paragraph (d) of this section for changes involving the addition of processes or equipment at the affected source.

(ii) You must submit a report 60 days before the scheduled implementation date of any of the changes identified in paragraphs (e)(8)(ii)(A), (B), or (C) of this section.

(A) Any change to the information contained in either the precompliance report or any previously reported change to the precompliance report.

(B) A change in the status of a control device from small to large.

(C) A change in compliance status.

§ 63.8080 What records must I keep?

You must keep the records specified in paragraphs (a) through (g) of this section.

(a) Each applicable record required by subpart A of this part 63 and in referenced subparts SS, TT, UU, and WW of this part 63.

(b) If complying with emissions averaging, records of the monthly number of batches for each process vessel, the quarterly actual emissions for each process vessel, the quarterly estimated emissions for each process vessel if it had been controlled as specified in Table 1 to this subpart, and comparison of the sums of the quarterly actual and estimated emissions as specified in §63.8050(d).

(c) A record of each time a safety device is opened to avoid unsafe conditions in accordance with §63.8000(b)(2).

(d) Records of the results of each CPMS calibration check and the maintenance performed, as specified in §63.8000(d)(5).

(g) If you establish separate operating limits as allowed in §63.8005(e), you must maintain a log of operation or a daily schedule indicating the time when you change from one operating limit to another.

§ 63.8095 What parts of the General Provisions apply to me?

Table 10 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

§ 63.8100 Who implements and enforces this subpart?

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

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraphs (b)(1) through (4) of this section are retained by the Administrator of U.S. EPA and are not delegated to the State, local, or tribal agency.

(1) Approval of alternatives to the non-opacity emission limits and work practice standards in §63.8000(a) under §63.6(g).

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major alternatives to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

§ 63.8105 What definitions apply to this subpart?

(a) For an affected source complying with the requirements in subpart SS of this part 63, the terms used in this subpart and in subpart SS of this part 63 have the meaning given them in §63.981, except as specified in §§63.8000(d)(5)(ii) and (7), 63.8010(c)(2), 63.8025(b), and paragraph (g) of this section.

(b) For an affected source complying with the requirements in subpart TT of this part 63, the terms used in this subpart and in subpart TT of this part 63 have the meaning given them in §63.1001.

(c) For an affected source complying with the requirements in subpart UU of this part 63, the terms used in this subpart and in subpart UU of this part 63 have the meaning given them in §63.1020.

(d) For an affected source complying with the requirements in subpart WW of this part 63, the terms used in this subpart and subpart WW of this part 63 have the meaning given them in §63.1061, except as specified in §§63.8000(d)(7), 63.8010(c)(2), and paragraph (g) of this section.

(e) For an affected source complying with requirements in §§63.1253, 63.1257, and 63.1258, the terms used in this subpart and in §§63.1253, 63.1257, and 63.1258 have the meaning given them in §63.1251, except as specified in §63.8000(d)(7) and paragraph (g) of this section.

(f) For an affected source complying with the requirements of §63.104, the terms used in this subpart and in §63.104 have the meaning given them in §63.101, except as specified in §63.8000(d)(7) and paragraph (g) of this section.

(g) All other terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this paragraph

(g). If a term is defined in §63.2, §63.981, §63.1001, §63.1020, §63.1061, or §63.1251 and in this paragraph (g), the definition in this paragraph (g) applies for the purposes of this subpart.
Bulk loading means the loading, into a tank truck or rail car, of liquid coating products that contain one or more of the organic HAP, as defined in section 112 of the CAA, from a loading rack. A loading rack is the system used to fill tank trucks and railcars at a single geographic site.

Coating means any material such as a paint, ink, or adhesive that is intended to be applied to a substrate and consists of a mixture of resins, pigments, solvents, and/or other additives. Typically, these materials are described by Standard Industry Classification (SIC) codes 285 or 289 and North American Industry Classification System (NAICS) codes 3255 and 3259.

Construction means the onsite fabrication, erection, or installation of an affected source. Addition of new equipment to an affected source does not constitute construction, but it may constitute reconstruction of the affected source if it satisfies the definition of reconstruction in §63.2.

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

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

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

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

Enhanced biological treatment system means an aerated, thoroughly mixed treatment unit(s) that contains biomass suspended in water followed by a clarifier that removes biomass from the treated water and recycles recovered biomass to the aeration unit. The mixed liquor volatile suspended solids (biomass) is greater than 1 kilogram per cubic meter throughout each aeration unit. The biomass is suspended and aerated in the water of the aeration unit(s) either by submerged air flow or mechanical agitation. A thoroughly mixed treatment unit is a unit that is designed and operated to approach or achieve uniform biomass distribution and organic compound concentration throughout the aeration unit by quickly dispersing the recycled biomass and the wastewater entering the unit.

Excess emissions means emissions greater than those allowed by the emission limit.

Group 1a storage tank means a storage tank at an existing source with a capacity greater than or equal to 20,000 gal storing material that has a maximum true vapor pressure of total organic HAP greater than or equal to 1.9 pounds per square inch, absolute (psia). Group 1a storage tank also means a storage tank at a new source with either a capacity greater than or equal to 25,000 gal storing material that has a maximum true vapor pressure of total HAP greater than or equal to 0.1 psia or a capacity greater than or equal to 20,000 gal and less than 25,000 gal storing material that has a maximum true vapor pressure of total HAP greater than or equal to 1.5 psia.

Group 1b storage tank means a storage tank at a new source that has a capacity greater than or equal to 10,000 gal, stores material that has a maximum true vapor pressure of total organic HAP greater than or equal to 0.02 psia, and is not a Group 1a storage tank.

Group 2 storage tank means a storage tank that does not meet the definition of a Group 1a or Group 1b storage tank.

Group 1 transfer operations means all bulk loading of coating products if the coatings contain greater

than or equal to 3.0 million gallons per year (gal/yr) of HAP with a weighted average HAP partial pressure greater than or equal to 1.5 psia.

Group 2 transfer operations means bulk loading of coating products that does not meet the definition of Group 1 transfer operations, and all loading of coating products from a loading rack to other types of containers such as cans, drums, and totes.

Group 1 wastewater stream means a wastewater stream that contains total partially soluble and soluble HAP at an annual average concentration greater than or equal to 4,000 parts per million by weight (ppmw) and load greater than or equal to 750 pounds per year (lb/yr) at an existing source or greater than or equal to 1,600 ppmw and any partially soluble and soluble HAP load at a new source.

Group 2 wastewater stream means a wastewater stream that does not meet the definition of a Group 1 wastewater stream.

Halogenated vent stream means a vent stream determined to contain halogen atoms in organic compounds at a concentration greater than or equal to 20 ppmv as determined by the procedures specified in §63.8000(b).

Hydrogen halide and halogen HAP means hydrogen chloride, chlorine, and hydrogen fluoride.

In organic HAP service means that a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAP as determined according to the provisions of §63.180(d). The provisions of §63.180(d) also specify how to determine that a piece of equipment is not in organic HAP service.

Large control device means a control device that controls total HAP emissions of greater than or equal to 10 tpy, before control.

Maximum true vapor pressure means the equilibrium partial pressure exerted by the total organic HAP in the stored or transferred liquid at the temperature equal to the highest calendar-month average of the liquid storage or transfer temperature for liquids stored or transferred above or below the ambient temperature or at the local maximum monthly average temperature as reported by the National Weather Service for liquids stored or transferred at the ambient temperature, as determined:

(1) In accordance with methods described in American Petroleum Institute Publication 2517, Evaporative Loss From External Floating-Roof Tanks (incorporated by reference as specified in §63.14 of subpart A of this part 63); or

(2) As obtained from standard reference texts; or

(3) As determined by the American Society for Testing and Materials Method D2879–83 (incorporated by reference as specified in §63.14 of subpart A of this part); or

(4) Any other method approved by the Administrator.

Partially soluble HAP means HAP listed in Table 7 of this subpart.

Point of determination (POD) means each point where process wastewater exits the miscellaneous coating operations.

Note to definition for point of determination: The regulation allows determination of the characteristics of

a wastewater stream at the point of determination or downstream of the point of determination if corrections are made for changes in flow rate and annual average concentration of partially soluble and soluble HAP compounds as determined in §63.144. Such changes include losses by air emissions; reduction of annual average concentration or changes in flow rate by mixing with other water or wastewater streams; and reduction in flow rate or annual average concentration by treating or otherwise handling the wastewater stream to remove or destroy HAP.

Process vessel means any stationary or portable tank or other vessel with a capacity greater than or equal to 250 gal and in which mixing, blending, diluting, dissolving, temporary holding, and other processing steps occur in the manufacturing of a coating.

Process vessel vent means a vent from a process vessel or vents from multiple process vessels that are manifolded together into a common header, through which a HAP-containing gas stream is, or has the potential to be, released to the atmosphere. Emission streams that are undiluted and uncontrolled containing less than 50 ppmv HAP, as determined through process knowledge that no HAP are present in the emission stream or using an engineering assessment as discussed in §63.1257(d)(2)(ii), test data using Method 18 of 40 CFR part 60, appendix A, or any other test method that has been validated according to the procedures in Method 301 of appendix A of this part, are not considered process vessel vents. Flexible elephant trunk systems when used with closed vent systems and drawing ambient air (i.e., the system is not ducted, piped, or otherwise connected to the unit operations) away from operators when vessels are opened are not process vessel vents. Process vessel vents do not include vents on storage tanks, wastewater emission sources, or pieces of equipment subject to the requirements in Table 3 of this subpart. A gas stream going to a fuel gas system is not a process vessel vent. A gas stream routed to a process for a process purpose is not a process vessel vent.

Recovery device, as used in the wastewater provisions, means an individual unit of equipment used for the purpose of recovering chemicals for fuel value (i.e., net positive heating value), use, reuse, or for sale for fuel value, use, or reuse. Examples of equipment that may be recovery devices include organic removal devices such as decanters, strippers, or thin-film evaporation units. To be a recovery device, a decanter and any other equipment based on the operating principle of gravity separation must receive only multi-phase liquid streams. A recovery device is considered part of the miscellaneous coating manufacturing operations.

Responsible official means responsible official as defined in 40 CFR 70.2.

Safety device means a closure device such as a pressure relief valve, frangible disc, fusible plug, or any other type of device which functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere during unsafe conditions resulting from an unplanned, accidental, or emergency event. For the purposes of this subpart, a safety device is not used for routine venting of gases or vapors from the vapor headspace underneath a cover such as during filling of the unit or to adjust the pressure in response to normal daily diurnal ambient temperature fluctuations. A safety device is designed to remain in a closed position during normal operations and open only when the internal pressure, or another relevant parameter, exceeds the device threshold setting applicable to the air emission control equipment as determined by the owner or operator based on manufacturer recommendations, applicable regulations, fire protection and prevention codes and practices, or other requirements for the safe handling of flammable, combustible, explosive, reactive, or hazardous materials.

Shutdown means the cessation of operation of an affected source, any process vessels within an affected source, or equipment required or used to comply with this subpart if steps taken to cease operation differ from those under routine procedures for removing the vessel or equipment from service. Shutdown also applies to the emptying and degassing of storage tanks.

Small control device means a control device that controls total HAP emissions of less than 10 tpy, before control.
Soluble HAP means the HAP listed in Table 8 of this subpart.

Startup means the setting in operation of a new affected source. For new equipment added to an affected source, including equipment required or used to comply with this subpart, startup means the first time the equipment is put into operation. Startup includes the setting in operation of equipment any time the steps taken differ from routine procedures for putting the equipment into operation.

Storage tank means a tank or other vessel that is used to store organic liquids that contain one or more HAP as raw material feedstocks or products. The following are not considered storage tanks for the purposes of this subpart:

(1) Vessels permanently attached to motor vehicles such as trucks, railcars, barges, or ships;

(2) Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere;

(3) Vessels storing organic liquids that contain HAP only as impurities;

(4) Wastewater storage tanks; and

(5) Process vessels.

Total organic compounds or (TOC) means the total gaseous organic compounds (minus methane and ethane) in a vent stream.

Wastewater storage tank means a stationary structure that is designed to contain an accumulation of wastewater and is constructed primarily of nonearthen materials (e.g., wood, concrete, steel, plastic) which provide structural support.

Wastewater stream means water that is discarded from miscellaneous coating manufacturing operations through a POD, and that contains an annual average concentration of total partially soluble and soluble HAP compounds of at least 1,600 ppmw at any flow rate. For the purposes of this subpart, noncontact cooling water is not considered a wastewater stream.

Work practice standard means any design, equipment, work practice, or operational standard, or combination thereof, that is promulgated pursuant to section 112(h) of the Clean Air Act.

Table 1 to Subpart HHHHH of Part 63—Emission Limits and Work Practice Standards for Process Vessels

As required in §63.8005, you must meet each emission limit and work practice standard in the following table that applies to your process vessels.

For Each	You Must	And you Must
1. Portable process vessel at an existing source.	Equip the vessel with a cover or lid that must be in place at all times when the vessel contains a HAP.	Non applicable
2. Stationary process vessel at an existing source.	a. Equip the vessel with a cover or lid that must be in place at all times when the vessel contains a HAP; or.	i. Considering both capture and any combination of control (except a flare), reduce emissions by ≥75 percent by weight for each HAP with a vapor pressure ≥0.6 kPa and by ≥60 percent for each HAP with a vapor pressure <0.6 kPa.
	b. Equip the vessel with a tightly fitting vented cover or lid that must be closed at all times when the vessel contains HAP.	i. Reduce emissions of each HAP with a vapor pressure ≥0.6 kPa by ≥75 percent by weight and each HAP with a vapor pressure <0.6 kPa by ≥60 percent by weight by venting emissions through a closed-vent system to any combination of control devices (except a flare); or ii. Reduce emissions of total organic HAP by

For Each	You Must	And you Must
		venting emissions from a non-halogenated vent stream through a closed-vent system to a flare; or iii. Reduce emissions of total organic HAP by venting emissions through a closed-vent system to a condenser that reduces the outlet gas temperature to: <10°C if the process vessel contains HAP with a partial pressure <0.6 kPa, or <2°C if the process vessel contains HAP with a partial pressure ≥0.6 kPa and <17.2 kPa, or <¥5°C if the process vessel contains HAP with a partial pressure ≥17.2 kPa.
4. Halogenated vent steam from a process vessel subject to the requirements of item 2 or 3 of this table for which you use a combustion control device to control organic HAP emissions.	a. Use a halogen reduction device after the combustion control device; or	i. Reduce overall emissions of hydrogen halide and halogen HAP by ≥95 percent; or ii. Reduce overall emissions of hydrogen halide and halogen HAP to ≤0.45 kilogram per hour (kg/hr).
	b. Use a halogen reduction device before the combustion control device.	Reduce the halogen atom mass emission rate to ≤0.45 kg/hr.

Table 7 to Subpart HHHHH of Part 63—Partially Soluble Hazardous Air Pollutants

As specified in §63.8020, the partially soluble HAP in wastewater that are subject to management and treatment requirements in this subpart are listed in the following table:

Chemical name . . .	CAS No.
1. 1,1,1-Trichloroethane (methyl chloroform)	71556
2. 1,1,2,2-Tetrachloroethane	79345
3. 1,1,2-Trichloroethane	79005
4. 1,1-Dichloroethylene (vinylidene chloride)	75354
5. 1,2-Dibromoethane	106934
6. 1,2-Dichloroethane (ethylene dichloride)	107062
7. 1,2-Dichloropropane	78875
8. 1,3-Dichloropropene	542756
9. 2,4,5-Trichlorophenol	95954
10. 2-Butanone (MEK)	78933
11. 1,4-Dichlorobenzene	106467
12. 2-Nitropropane	79469
13. 4-Methyl-2-pentanone (MIBK)	108101
14. Acetaldehyde	75070
15. Acrolein	107028
16. Acrylonitrile	107131
17. Allyl chloride	107051
18. Benzene	71432
19. Benzyl chloride	100447
20. Biphenyl	92524
21. Bromoform (tribromomethane)	75252
22. Bromomethane	74839
23. Butadiene	106990
24. Carbon disulfide	75150
25. Chlorobenzene	108907
26. Chloroethane (ethyl chloride)	75003
27. Chloroform	67663
28. Chloromethane	74873
29. Chloroprene	126998
30. Cumene	98828
31. Dichloroethyl ether	111444

Table 7 to Subpart HHHHH of Part 63—Partially Soluble Hazardous Air Pollutants

As specified in §63.8020, the partially soluble HAP in wastewater that are subject to management and treatment requirements in this subpart are listed in the following table:

Chemical name	CAS No.
32. Dinitrophenol	51285
33. Epichlorohydrin	106898
34. Ethyl acrylate	140885
35. Ethylbenzene	100414
36. Ethylene oxide	75218
37. Ethylidene dichloride	75343
38. Hexachlorobenzene	118741
39. Hexachlorobutadiene	87683
40. Hexachloroethane	67721
41. Methyl methacrylate	80626
42. Methyl-t-butyl ether	1634044
43. Methylene chloride	75092
44. N-hexane	110543
45. N,N-dimethylaniline	121697
46. Naphthalene	91203
47. Phosgene	75445
48. Propionaldehyde	123386
49. Propylene oxide	75569
50. Styrene	100425
51. Tetrachloroethylene (perchloroethylene)	127184
52. Tetrachloromethane (carbon tetrachloride)	56235
53. Toluene	108883
54. Trichlorobenzene (1,2,4-)	120821
55. Trichloroethylene	79016
56. Trimethylpentane	540841
57. Vinyl acetate	108054
58. Vinyl chloride	75014
59. Xylene (m)	108383
60. Xylene (o)	95476
61. Xylene (p)	106423

[68 FR 69185, Dec. 11, 2003, as amended at 70 FR 25683, May 13, 2005]

Table 8 to Subpart FFFF of Part 63—Soluble Hazardous Air Pollutants

As specified in §63.8020, the soluble HAP in wastewater that are subject to management and treatment requirements of this subpart are listed in the following table:

Chemical name . . .	CAS No.
1. Acetonitrile	75058
2. Acetophenone	98862
3. Diethyl sulfate	64675
4. Dimethyl hydrazine (1,1)	57147
5. Dimethyl sulfate	77781
6. Dinitrotoluene (2,4)	121142
7. Dioxane (1,4)	123911
8. Ethylene glycol dimethyl ether	110714
9. Ethylene glycol monobutyl ether acetate	112072
10. Ethylene glycol monomethyl ether acetate	110496
11. Isophorone	78591
12. Methanol	67561
13. Nitrobenzene	98953
14. Toluidine (o-)	95534
15. Triethylamine	121448

[68 FR 69185, Dec. 11, 2003, as amended at 70 FR 25683, May 13, 2005]

Table 9 to Subpart HHHHH of Part 63—Requirements for Reports

As required in §63.8075(a) and (b), you must submit each report that applies to you on the schedule shown in the following table:

You must submit a	**The report must contain .**	**You must submit the report**
1. Precompliance report	The information specified in § 63.8075(c)	At least 6 months prior to the compliance date; or for new sources, with the application for approval of construction or reconstruction.
2. Notification of compliance status report	The information specified in § 63.8075(d)	No later than 150 days after the compliance date specified in § 63.7995.
3. Compliance report	The information specified in § 63.8075(e)	Semiannually according to the requirements in § 63.8075(b).

Table 10 to Subpart HHHHH of Part 63—Applicability of General Provisions to Subpart HHHHH

As specified in §63.8095, the parts of the General Provisions that apply to you are shown in the following table:

Citation	Subject	Explanation
§ 63.1	Applicability	Yes.
§ 63.2	Definitions	Yes.
§ 63.3	Units and Abbreviations	Yes.
§ 63.4	Prohibited Activities	Yes.
§ 63.5	Construction/Reconstruction	Yes.
§ 63.6(a)	Applicability	Yes.
§ 63.6(b)(1)-(4)	Compliance Dates for New and Reconstructed sources.	Yes.
§ 63.6(b)(5)	Notification	Yes.
§ 63.6(b)(6)	[Reserved]	
§ 63.6(b)(7)	Compliance Dates for New and Reconstructed Area Sources That Become Major.	Yes.
§ 63.6(c)(1)-(2)	Compliance Dates for Existing Sources.	Yes.
§ 63.6(c)(3)-(4)	[Reserved]	
§ 63.6(c)(5)	Compliance Dates for Existing Area Sources That Become Major.	Yes.
§ 63.6(d)	[Reserved]	
§ 63.6(e)(1)-(2)	Operation & Maintenance	Yes.
§ 63.6(e)(3)(i), (ii), and (v) through (viii).	SSMP	Yes, except information regarding Group 2 emission points and equipment leaks is not required in the SSMP, as specified in § 63.8080(f).
§ 63.6(e)(3)(iii) and (iv)	Recordkeeping and Reporting During Startup, Shutdown, and Malfunction (SSM).	No, §§ 63.998(d)(3) and 63.998(c)(1)(ii)(D) through (G) specify the recordkeeping requirement for SSM events, and § 63.8075(e)(5) specifies reporting requirements.
§ 63.6(e)(3)(ix)	Title V permit	Yes.
§ 63.6(f)(1)	Compliance Except During SSM.	Yes.
§ 63.6(f)(2)-(3)	Methods for Determining Compliance.	Yes.
§ 63.6(g)(1)-(3)	Alternative Standard	Yes.

Table 10 to Subpart HHHHH of Part 63—Applicability of General Provisions to Subpart HHHHH

As specified in §63.8095, the parts of the General Provisions that apply to you are shown in the following table:

Citation	Subject	Explanation
§ 63.6(h)	Opacity/Visible Emission (VE) Standards.	Only for flares for which Method 22 observations are required as part of a flare compliance assessment.
§ 63.6(i)(1)-(14)	Compliance Extension	Yes.
§ 63.6(j)	Presidential Compliance Exemption.	Yes.
§ 63.7(a)(1)-(2)	Performance Test Dates	Yes, except substitute 150 days for 180 days.
§ 63.7(a)(3)	CAA Section 114 Authority	Yes, and this paragraph also applies to flare compliance assessments as specified under § 63.997(b)(2).
§ 63.7(b)(1)	Notification of Performance Test.	Yes.
§ 63.7(b)(2)	Notification of Rescheduling.	Yes.
§ 63.7(c)	Quality Assurance/Test Plan	Yes, except the test plan must be submitted with the notification of the performance test if the control device controls process vessels.
§ 63.7(d)	Testing Facilities	Yes.
§ 63.7(e)(1)	Conditions for Conducting Performance Tests.	Yes, except that performance tests for process vessels must be conducted under worst-case conditions as specified in § 63.8005.
§ 63.7(e)(2)	Conditions for Conducting Performance Tests.	Yes.
§ 63.7(e)(3)	Test Run Duration	Yes.
§ 63.7(f)	Alternative Test Method	Yes.
§ 63.7(g)	Performance Test Data Analysis.	Yes.
§ 63.7(h)	Waiver of Tests	Yes.
§ 63.8(a)(1)	Applicability of Monitoring Requirements.	Yes.
§ 63.8(a)(2)	Performance Specifications.	Yes.
§ 63.8(a)(3)	[Reserved]	
§ 63.8(a)(4)	Monitoring with Flares	Yes.
§ 63.8(b)(1)	Monitoring	Yes.

Table 10 to Subpart HHHHH of Part 63—Applicability of General Provisions to Subpart HHHHH

As specified in §63.8095, the parts of the General Provisions that apply to you are shown in the following table:

Citation	Subject	Explanation
§ 63.8(b)(2)-(3)	Multiple Effluents and Multiple Monitoring Systems.	Yes.
§ 63.8(c)(1)	Monitoring System Operation and Maintenance.	Yes.
§ 63.8(c)(1)(i)	Maintain and operate CMS...	Yes.
§ 63.8(c)(1)(ii)	Routine repairs	Yes.
§ 63.8(c)(1)(iii)	SSMP for CMS	Yes.
§ 63.8(c)(2)-(3)	Monitoring System Installation.	Yes.
§ 63.8(c)(4)	Requirements	Only for CEMS; requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63. This subpart does not contain requirements for continuous opacity monitoring systems (COMS).
§ 63.8(c)(4)(i)	CMS Requirements	No. This subpart does not require COMS.
§ 63.8(c)(4)(ii)	CMS requirements	Yes.
§ 63.8(c)(5)	COMS Minimum Procedures	No. This subpart does not contain opacity or VE limits.
§ 63.8(c)(6)	CMS Requirements	Only for CEMS; requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63.
§ 63.8(c)(7)-(8)	CMS Requirements	Only for CEMS. Requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63.
§ 63.8(d)	CMS Quality Control	Only for CEMS; requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63.
§ 63.8(e)	CMS Performance Evaluation.	Section 63.8(e)(6)(ii) does not apply because this subpart does not require COMS. Other sections apply only for CEMS; requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63.
§ 63.8(f)(1)-(5)	Alternative Monitoring Method.	Yes, except you may also request approval using the precompliance report.
§ 63.8(f)(6)	Alternative to Relative Accuracy Test.	Only for CEMS.

Table 10 to Subpart HHHHH of Part 63—Applicability of General Provisions to Subpart HHHHH

As specified in §63.8095, the parts of the General Provisions that apply to you are shown in the following table:

Citation	Subject	Explanation
§ 63.8(g)(1)-(4)	Data Reduction	Only when using CEMS, except § 63.8(g)(2) does not apply because data reduction requirements for CEMS are specified in § 63.8000(d)(4)(iv). The requirements for COMS do not apply because this subpart has no opacity or VE limits.
§ 63.8(g)(5)	Data Reduction	No. Requirements for CEMS are specified in § 63.8000(d)(4). Requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63.
§ 63.9(a)	Notification Requirements	Yes.
§ 63.9(b)(1)-(5)	Initial Notifications	Yes.
§ 63.9(c)	Request for Compliance Extension.	Yes.
§ 63.9(d)	Notification of Special Compliance Requirements for New Source.	Yes.
§ 63.9(e)	Notification of Performance Test.	Yes.
§ 63.9(f)	Notification of VE/Opacity Test.	No. This subpart does not contain opacity or VE limits.
§ 63.9(g)	Additional Notifications When Using CMS.	Only for CEMS; requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63.
§ 63.9(h)(1)-(6)	Notification of Compliance Status.	Yes, except this subpart has no opacity or VE limits, and § 63.9(h)(2) does not apply because § 63.8075(d) specifies the required contents and due date of the notification of compliance status report.
§ 63.9(i)	Adjustment of Submittal Deadlines.	Yes.
§ 63.9(j)	Change in Previous Information.	No, § 63.8075(e)(8) specifies reporting requirements for process changes.
§ 63.10(a)	Recordkeeping/Reporting	Yes.
§ 63.10(b)(1)	Recordkeeping/Reporting	Yes.

Table 10 to Subpart HHHHH of Part 63—Applicability of General Provisions to Subpart HHHHH

As specified in §63.8095, the parts of the General Provisions that apply to you are shown in the following table:

Citation	Subject	Explanation
§ 63.10(b)(2)(i)-(iv)	Records related to SSM	No, §§ 63.998(d)(3) and 63.998(c)(1)(ii)(D) through (G) specify recordkeeping requirements for periods of SSM.
§ 63.10(b)(2)(iii)	Records related to maintenance of air pollution control equipment.	Yes.
§ 63.10(b)(2)(vi), (x), and (xi)	CMS Records	Only for CEMS; requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63.
§ 63.10(b)(2)(vii)-(ix)	Records	Yes.
§ 63.10(b)(2)(xii)	Records	Yes.
§ 63.10(b)(2)(xiii)	Records	Yes.
§ 63.10(b)(2)(xiv)	Records	Yes.
§ 63.10(b)(3)	Records	Yes.
§ 63.10(c)(1)-(6),(9)-(15)	Records	Only for CEMS; requirements for CPMS are specified in referenced subpart SS of 40 CFR part 63.
§ 63.10(c)(7)-(8)	Records	No. Recordkeeping requirements are specified in § 63.8080.
§ 63.10(d)(1)	General Reporting Requirements.	Yes.
§ 63.10(d)(2)	Report of Performance Test Results.	Yes.
§ 63.10(d)(3)	Reporting Opacity or VE Observations.	No. This subpart does not contain opacity or VE limits.
§ 63.10(d)(4)	Progress Reports	Yes.
§ 63.10(d)(5)(i)	SSM Reports	No, § 63.8075(e)(5) and (6) specify the SSM reporting requirements.
§ 63.10(d)(5)(ii)	Immediate SSM reports	No.
§ 63.10(e)(1)-(2)	Additional CMS Reports	Only for CEMS, but § 63.10(e)(2)(ii) does not apply because this subpart does not require COMS.
§ 63.10(e)(3)	Reports	No. Reporting requirements are specified in § 63.8075.
§ 63.10(e)(3)(i)-(iii)	Reports	No. Reporting requirements are specified in § 63.8075.

Table 10 to Subpart HHHHH of Part 63—Applicability of General Provisions to Subpart HHHHH

As specified in §63.8095, the parts of the General Provisions that apply to you are shown in the following table:

Citation	Subject	Explanation
§ 63.10(e)(3)(iv)-(v)	Excess Emissions Reports	No. Reporting requirements are specified in § 63.8075.
§ 63.10(e)(3)(vi-viii)	Excess Emissions Report and Summary Report.	No. Reporting requirements are specified in § 63.8075.
§ 63.10(e)(4)	Reporting COMS data	No. This subpart does not contain opacity or VE limits.
§ 63.10(f)	Waiver for Recordkeeping/ Reporting.	Yes.
§ 63.11	Flares	Yes.
§ 63.12	Delegation	Yes.
§ 63.13	Addresses	Yes.
§ 63.14	Incorporation by Reference.	Yes.
§ 63.15	Availability of Information	Yes.

E.1.3 One Time Deadlines Relating to NESHAP HHHHH

(a) The Permittee shall submit an Initial Notification no later than April 10, 2004 [40 CFR 63.8070(b)].

(b) The Permittee shall submit a precompliance report no later than June 11, 2006, pursuant to 40 CFR 63.8075(c).

(c) The Permittee shall submit notification of compliance status no later than May 10, 2007 [40 CFR 63.8075(d)].

(d) The Permittee shall submit a first Semi-annual Compliance Report no later than August 8, 2007 [40 CFR 63.8075(e)].

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Ferro Corporation
Source Address: 1301 North Flora Street Plymouth, IN 46563
Mailing Address: 1301 North Flora Street Plymouth, IN 46563
Part 70 Permit No.: T099-18688-00025

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit. Please check what document is being certified: ☐ Annual Compliance Certification Letter ☐ Test Result (specify) ☐ Report (specify) ☐ Notification (specify) ☐ Affidavit (specify) ☐ Other (specify)

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Ferro Corporation
Source Address: 1301 North Flora Street Plymouth, IN 46563
Mailing Address: 1301 North Flora Street Plymouth, IN 46563
Part 70 Permit No.: T099-18688-00025

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

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Ferro Corporation
Source Address: 1301 North Flora Street Plymouth, IN 46563
Mailing Address: 1301 North Flora Street Plymouth, IN 46563
Part 70 Permit No.: T099-18688-00025

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, 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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Ferro Corporation
Source Address: 1301 North Flora Street Plymouth, IN 46563
Mailing Address: 1301 North Flora Street Plymouth, IN 46563
Part 70 Permit No.: T099-18688-00025
Facility: Mixers M1 through M18 and M20
Parameter: Production of gelcoats, liquid pastes, and cordobond
Limit: The raw material for the production of polyester gelcoats, liquid pastes, and cordobond, shall be limited to less than 14,023.4, 27,489.3, and 1,790 tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

YEAR:

Month	Column 1			Column 2			Column 1 + Column 2		
	Gelcoat Production This Month	Liquid Paste Production This Month	Cordobond Production This Month	Gelcoat Production Previous 11 Months	Liquid Paste Production Previous 11 Months	Cordobond Production Previous 11 Months	Gelcoat Production 12 Month Total	Liquid Paste Production 12 Month Total	Cordobond Production 12 Month Total
Month 1									
Month 2									
Month 3									

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Ferro Corporation
Source Address: 1301 North Flora Street Plymouth, IN 46563
Mailing Address: 1301 North Flora Street Plymouth, IN 46563
Part 70 Permit No.: T099-18688-00025
Facility: Mixers M1 through M18 and M20
Parameter: VOC Emissions
Limit: The VOC emissions shall be limited to less than 248.9 tons per 12 consecutive month period, with compliance determined at the end of each month, using the following formula:

VOC emissions = (amount of gelcoat production) x (VOC emission rate for 0.015 pound of VOC per pound of gelcoat produced) + (amount of liquid paste production) x (VOC emission rate for 0.0001 pound of VOC per pound of liquid paste produced) + (amount of cordobond production) x (VOC emission rate for 0.02 pound of VOC per pound of cordobond produced)

YEAR:

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Ferro Corporation
Source Address: 1301 North Flora Street Plymouth, IN 46563
Mailing Address: 1301 North Flora Street Plymouth, IN 46563
Part 70 Permit No.: T099-18688-00025
Facility: Mixer M20
Parameter: Production of gelcoats
Limit: The amount of gelcoat produced at Mixer M20 shall be limited to less than 1,666 tons per twelve (12) consecutive month period with compliance determined at the end of each month such that the potential to emit (PTE) of VOC shall be limited to less than 25 tons per twelve (12) consecutive months.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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

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

Source Background and Description

Source Name:	**Ferro Corporation**
Source Location:	**1301 North Flora Street, Plymouth, IN 46563**
County:	**Marshall**
SIC Code:	**3087**
Operation Permit No.:	**T099-18688-00025**
Permit Reviewer:	**Alic Bent/EVP**

On June 30, 2007, the Office of Air Quality (OAQ) had a notice published in the Plymouth Pilot News in Plymouth, Indiana, stating that Ferro Corporation had applied for a Part 70 permit renewal for the operation of a stationary manufacturing plant for the production of liquid coatings and dispersions. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review IDEM, OAQ has made the following changes to the Part 70 permit renewal (additions in **bold**, deletions in ~~strikeout~~):

1. The last sentence of original Condition C.3 – Open Burning, was deleted because the provisions of 326 IAC 326 IAC 4-1-3 (a)(2)(A) and (B) are federally enforceable and are included in Indiana's State Implementation Plan (SIP).

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.~~

2. Condition D.1.1(b), (d), and (f) refers to Mixers M1 through M18 and M2. This should read Mixers M1 through M18 and M20, instead. Condition D.1.1(b), (d), and (f) was revised to correct the typographical error.

D.1.1 PSD Minor Limit [326 IAC 2-2]

The total amount of VOC input to Mixers M1 through M18 and M20, including polyester gelcoats, pastes, and cordobond, shall be limited to less than 248.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, based upon the following:

(a) The amount of gelcoat produced shall be less than 14,023.4 tons per 12 consecutive month period with compliance determined at the end of each month.

(b) The VOC emission rate from the gelcoats produced at Mixers M1 through M18 and M2**0** shall not exceed 0.015 pound of VOC per pound of gelcoat produced.

(c) The amount of liquid paste produced shall be less than 27,489.3 tons per 12 consecutive month period with compliance determined at the end of each month.

(d) The VOC emission rate from the liquid paste produced at Mixers M1 through M18 and M2**0** shall not exceed 0.0001 pound of VOC per pound of liquid paste produced.

(e) The amount of cordobond produced shall be less that 1,790 tons per 12 consecutive month period with compliance determined at the end of each month.

(f) The VOC emission rate from the cordobond produced at Mixers M1 through M18 and M2**0** shall not exceed 0.02 pound of VOC per pound of cordobond produced.

3. In Condition D.1.7 (Testing Requirements), VOC testing is required for Mixers M1 through M18 and M20 for the limits in Condition D.1.1. In Condition D.1.1 there are three different types of materials (gel coat, liquid paste and cordobond) which can be produced and three different limits. This would require a lot of testing. Therefore, IDEM, OAQ has determined that testing shall be performed on representative mixers to demonstrate compliance with the emission limits in Condition D.1.1. Therefore, Condition D.1.7 has been revised as shown below:

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days after the issuance of this permit, the Permittee shall perform VOC testing on ~~mixers M1 through M18 and M20~~ **representative mixers M1 (cordobond), M11 (gel coat) and M16 (liquid paste)**, using methods as approved by the Commissioner, in order to demonstrate compliance with Condition D.1.1. The test on Mixers ~~M1 through M18 and M20~~ **M1, M11 and M16** shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. **The Office of Air Quality has determined that testing should be performed on Mixers M1, M11 and M16 to demonstrate compliance with the emission limits in Condition D.1.1.** Testing shall be conducted in accordance with Section C - Performance Testing.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Ferro Corporation**
Source Location:	**1301 North Flora Street, Plymouth, IN 46563**
County:	**Marshall**
SIC Code:	**3087**
Operation Permit No.:	**T099-7538-00025**
Operation Permit Issuance Date:	**December 14, 1999**
Permit Renewal No.:	**T099-18688-00025**
Permit Reviewer:	**Alic Bent / EVP**

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Ferro Corporation relating to the manufacturing of liquid coatings and dispersions.

History

The Ferro Corporation Part 70 permit renewal was on Public Notice from November 27, 2004 to December 26, 2004. After the initial public notice period, the source requested that detailed NESHAP language be incorporated into the permit. Hence, the permit is being re-submitted for public notice after incorporating the detailed NESHAP language.

Permitted Emission Units and Pollution Control Equipment

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

(a) Nineteen (19) mixers, consisting of:

(1) one (1) mixer, identified as M1 and constructed in 1969, with a maximum unit capacity of 3,800 pounds of raw material for gelcoat and cordobond production per batch, exhausting out of the building through exhaust fan EF 16,

(2) one (1) mixer, identified as M2 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(3) one (1) mixer, identified as M3 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(4) one (1) mixer, identified as M4 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(5) one (1) mixer, identified as M5 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat, liquid paste, and cordobond production per batch, exhausting out of the building through exhaust fan EF 13,

(6) one (1) mixer, identified as M6 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 13,

(7) one (1) mixer, identified as M7 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting within the building,

(8) one (1) mixer, identified as M8 and constructed in 1969, with a maximum unit capacity of 6,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 16,

(9) one (1) mixer, identified as M9 and constructed in 1969, with a maximum unit capacity of 7,800 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 12,

(10) one (1) mixer, identified as M10 and constructed in 1990, with a maximum unit capacity of 11,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 11,

(11) one (1) mixer, identified as M11 and constructed in 1990, with a maximum unit capacity of 5,000 pounds of raw material for gelcoat and liquid paste production per batch, utilizing baghouse G5 for particulate control, exhausting within the building,

(12) one (1) mixer, identified as M12 and constructed in 1995, with a maximum unit capacity of 4,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(13) one (1) mixer, identified as M13 and constructed in 1995, with a maximum unit capacity of 1,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(14) one (1) mixer, identified as M14 and constructed in 1995, with a maximum unit capacity of 500 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(15) one (1) mixer, identified as M15 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,

(16) one (1) mixer, identified as M16 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,

(17) one (1) mixer, identified as M17 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(18) one (1) mixer, identified as M18 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building, and

(19) one (1) mixer, identified as M20 and constructed in 2003, with a maximum unit capacity of 3,500 pounds of raw material for gel coat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 9.

Under NESHAP Subpart HHHHH, mixers M1 through M18 and M20 are each considered an existing affected source.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

(a) Natural gas-fired heaters with heat input equal to or less than ten (10) million Btu per hour,

(b) A laboratory as defined in 326 IAC 2-7-1(21)(D), consisting of:
- (1) one (1) Q/C gelcoat spraybooth, exhausting to stack EF20, utilizing dry filters as particulate control [326 IAC 6-3-2(d)],
- (2) one (1) electric heated oil roll mill identified as RM1,
- (3) two (2) Q/C lab drill presses [326 IAC 6-3-2], and
- (4) three (3) extruders, identified as IM1-IM3.

(c) Activities or categories with emissions equal to or less than significant thresholds:
- (1) three (3) Roll Mill/Lab Mills for gelcoat and liquid paste,
  - (i) one (1) 3-Roll Mill/Lab Mill, identified as RM2 with a maximum unit capacity of 0.75 hp, exhausting outside of the building through exhaust fan EF 14,
  - (ii) one (1) 3-Roll Mill, identified as RM3, exhausting outside of the building through exhaust fan EF 14,
  - (iii) one (1) 3-Roll Mill, identified as RM4, exhausting outside of the building through exhaust fan EF 14, and
- (2) Packaging area for cordobond, consisting of bottling, can filling and labeling,
- (3) Batching area, utilizing G1 for particulate control.
- (4) Tub washing (Acetone) and Storage Area,
- (5) two small mixers, identified as M22, and M21,
- (6) two (2) portable mixers, blenders with unit capacities of 100 pounds per hour, for dry color production, [326 IAC 6-3-2]
- (7) four (4) 6,000 gallon tanks storing bulk organic liquid, identified as ST1, ST2, ST3, and ST4,
- (8) two (2) 13,000 gallon tanks for storing bulk organic liquid, identified as ST5 and ST6,
- (9) two (2) 4,000 gallon tanks for storing bulk organic liquid, identified as ST7 and ST8, and
- (10) two (2) 6,000 gallon tanks for storing bulk organic liquid, identified as ST9 and ST10.

Existing Approvals

The source has been operating under the following previous approvals:

(a) Part 70 Operating Permit No. T099-7538-00025, issued on December 14, 1999;

(b) First Significant Permit Modification No. 099-11830-00025, issued on May 1, 2000; and

(c) First Part 70 Operating Permit Re-opening No. 099-13415-00025, issued on February 4, 2002.

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

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on March 22, 2004. Additional information was received July 29, 2004 and June 7, 2006.

Emission Calculations

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

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on December 14, 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.

	Potential to Emit (tons/year)						
Process / Emission unit	PM	PM-10	SO_2	NO_X	VOC	CO	HAPs
Mixing / M1-M18 & M20	131.16	131.16	0.00	0.00	248.9	0.00	239.48
Natural Gas Combustion	0.01	0.03	0.0	0.44	0.02	0.37	0.00
Storage Tank	0.00	0.00	0.00	0.00	0.8	0.00	0.00
Total PTE	131.17	131.19	0.00	0.44	249.7	0.37	239.48

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions reported by the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	2.98
PM-10	2.98
SO_2	0.00
VOC	76.63
CO	0.00
NO_x	0.00
HAPS	Not Reported

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx 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) Marshall County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

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

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Part 70 Permit Conditions

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

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The two (2) 13,000 gallon tanks, identified as ST5 and ST6 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb). This subpart does not apply to storage vessels with a capacity less than 75 cubic meters. The two (2) 13,000 gallon tanks, identified as ST5 and ST6 have a storage capacity less than 75 cubic meters, each. Therefore, the requirements of 40 CFR 60.110b, Subpart Kb are not included in the permit.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart W. This subpart applies to sources involved in the manufacturing of basic liquid epoxy resin or wet strength resins. This source mixes liquid epoxy resin or wet strength resins, but does not manufacture basic liquid epoxy resin or wet strength resins, as defined by 40 CFR 63.522. Therefore, the requirements of Subpart W are not included in the permit.

(c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart U. This subpart applies to sources involved in the processing of Group I Polymers and Resins. This source does not process Group I Polymers and Resins. Therefore, the requirements of Subpart U are not included in the permit.

(d) The gelcoat spray booth (Q/C) is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart WWWW because the gelcoat spray booth is not used in the manufacturing of reinforced and/or nonreinforced plastic composites or plastic molding compounds. The source uses the spray booth to spray gelcoat on small glass pieces, in the laboratory, to check the color of the sample. Therefore, the requirements of Subpart WWWW are not included in the permit.

(e) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63, Subpart HHHHH because the source is a major source of HAPs and also meets the definition of miscellaneous coating manufacturing facility, as defined in 40 CFR 63.7585(a). Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing, (40 CFR 63, Subpart HHHHH) are included in the permit.

Pursuant to 40 CFR 63.7990(c), this source is an existing affected source because the construction of the source commenced prior to April 4, 2002 and the source is not reconstructed. The specific affected facilities include:

(a) Nineteen (19) mixers, consisting of:

(1) one (1) mixer, identified as M1 and constructed in 1969, with a maximum unit capacity of 3,800 pounds of raw material for gelcoat and cordobond production per batch, exhausting out of the building through exhaust fan EF 16,

(2) one (1) mixer, identified as M2 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(3) one (1) mixer, identified as M3 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(4) one (1) mixer, identified as M4 and constructed in 1969, with a maximum unit capacity of 500 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 14,

(5) one (1) mixer, identified as M5 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat, liquid paste, and cordobond production per batch, exhausting out of the building through exhaust fan EF 13,

(6) one (1) mixer, identified as M6 and constructed in 1969, with a maximum unit capacity of 2,000 pounds of raw material for gelcoat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 13,

(7) one (1) mixer, identified as M7 and constructed in 1969, with a maximum unit capacity of 3,200 pounds of raw material for gelcoat and liquid paste production per batch, exhausting within the building,

(8) one (1) mixer, identified as M8 and constructed in 1969, with a maximum unit capacity of 6,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 16,

(9) one (1) mixer, identified as M9 and constructed in 1969, with a maximum unit capacity of 7,800 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 12,

(10) one (1) mixer, identified as M10 and constructed in 1990, with a maximum unit capacity of 11,000 pounds of raw material for gelcoat production per batch, exhausting out of the building through exhaust fan EF 11,

(11) one (1) mixer, identified as M11 and constructed in 1990, with a maximum unit capacity of 5,000 pounds of raw material for gelcoat and liquid paste production per batch, utilizing baghouse G5 for particulate control, exhausting within the building,

(12) one (1) mixer, identified as M12 and constructed in 1995, with a maximum unit capacity of 4,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(13) one (1) mixer, identified as M13 and constructed in 1995, with a maximum unit capacity of 1,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(14) one (1) mixer, identified as M14 and constructed in 1995, with a maximum unit capacity of 500 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(15) one (1) mixer, identified as M15 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,

(16) one (1) mixer, identified as M16 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G3 for particulate control, exhausting within the building,

(17) one (1) mixer, identified as M17 and constructed in 1995, each with a maximum unit capacity of 5,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building,

(18) one (1) mixer, identified as M18 and constructed in 1995, with a maximum unit capacity of 3,000 pounds of raw material for liquid paste production per batch, utilizing baghouse G4 for particulate control, exhausting within the building, and

(19) one (1) mixer, identified as M20 and constructed in 2003, with a maximum unit capacity of 3,500 pounds of raw material for gel coat and liquid paste production per batch, exhausting out of the building through exhaust fan EF 9.

Non applicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart HHHHH.

(1) 40 CFR 63.7980;

(2) 40 CFR 63.7985 (a) (1)(2)(3)(4) and (b)(1);

(3) 40 CFR 63.7990 (a), (b) and (c);

(4) 40 CFR 63.7995 (b) and (d);

(5) 40 CFR 63.8000 (a), (b)(1)(2), and (c)(1)(3);

(6) 40 CFR 63.8005 (a)(1)(i)(ii), (2), (b), (c), (d)(1) through (4), (e)(1), (2), (f) and (g);

(7) 40 CFR 63.8070 (a), (b)(1)(2) and (c);

(8) 40 CFR 63.8075 (a) and (b)(1)(2), (c)(1), (2), (3), (d)(1)(2)(i) through (iv) and (e)(1) through (6) and (8);

(9) 40 CFR 63.8080 (a) through (d) and (g);

(10) 40 CFR 63.8095;

(11) 40 CFR 63.8100 (a) and (b);

(12) 40 CFR 63.8105; and

(13) Tables 1, 7, 8, 9 and 10.

The provisions of 40 CFR 63, Subpart A – General Provisions apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart HHHHH.

(f) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
(2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
(3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source was issued initial Part 70 permit no. T099-7538-00025, on December 14, 1999. All the mixers, except M10 and M11, as PSEUs have uncontrolled PTE of VOC at less than 100 percent of the applicable major Part 70 threshold. The mixers M10 and M11 have uncontrolled PTE of VOC at greater than 100 percent of the applicable major Part 70 threshold and are subject to an emission limitation. However, they do not use a control device to comply with the emission limitation. The mixers M11 through M18 use baghouses as control devices for particulate emissions; however, all the Mixers M1-M18, M20 have uncontrolled PTE of PM and PM 10 at less than 100 percent of the applicable major Part 70 threshold. Hence 40 CFR Part 64, Compliance Assurance Monitoring, are not included in the permit for mixers M1 - M18 and M20.

State Rule Applicability – Entire Source

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

The source was constructed in 1969, before the PSD applicability date of August 7, 1977. This source has always been a minor stationary source because the controlled emissions of volatile organic compounds have always been less than 250 tons per year and it is not one of the 28 listed source categories.

The source was issued CP 099-0025 on November 21, 1990. This permit was issued based on the condition that the volatile organic compound (VOC) emissions from cordobond will not exceed 1.4 pounds per hour. After the issuance of this permit, the source was still a minor stationary source in 1990 because the potential emissions from the entire source were less than 250 tons per year of VOC.

The source was issued CP 099-4443 on October 30, 1995. This was a modification permit issued to install mixers M10-M18. The controlled potential to emit of VOC was 43.02 tons per year. The modification to the existing minor stationary source is not major because the increase in the VOC was less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD rules did not apply to the modification. After the issuance of this modification permit, the source was still a minor stationary source, after usage limits, in 1995.

Pursuant to T099-7538-00025, issued on December 14, 1999, the total amount of VOC input to mixers M1 through M18 and M20 shall be limited such that the potential to emit (PTE) VOC from the manufacture of liquid coatings and dispersions, including polyester gelcoats, pastes, and cordobond, shall be limited to less than 248.9 tons per twelve (12) consecutive month period. This VOC emission limit is required to limit source wide PTE of VOC to less than 250 tons per 12 consecutive month period, based upon the following:

(a) The amount of gelcoat produced shall be less than 14,023.4 tons per 12 consecutive month period with compliance determined at the end of each month.

(b) The amount of liquid paste produced shall be less than 27,489.3 tons per 12 consecutive month period with compliance determined at the end of each month.

(c) The amount of cordobond produced shall be less that 1,790 tons per 12 consecutive month period with compliance determined at the end of each month.

(d) Compliance shall be determined based on the following equation:

VOC emissions = (amount of gelcoat production) x (VOC emission rate for 0.015 pound of VOC per pound of gelcoat produced) + (amount of liquid paste production) x (VOC emission rate for 0.0001 pound of VOC per pound of liquid paste produced) + (amount of cordobond production) x (VOC emission rate for 0.02 pound of VOC per pound of cordobond produced)

The PSD minor throughput limits in conjunction with the emission factors contained in the equation above, will limit the potential to emit VOC to less than 249 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

The source did not have any new constructions or modifications after May 1, 2000.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted annually if the potential to emit of VOC or PM10 is greater than 250 tons per year, otherwise the emission statement shall be submitted triennially. For this source, the source wide emissions of VOC and PM10 are each less than 250 tons per year. Therefore, in accordance with the compliance schedule in 326 IAC 2-6-3(b)(1), an emission statement shall be submitted triennially by July 1 beginning in 2004 and every 3 years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

The operation of M1-M6, M8-M11 and M20 will emit greater than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. However, 326 IAC 2-4.1 will not apply, because these units are subject to the NESHAP, 40 CFR 63, Subpart HHHHH. Also, the mixers M1-M6 and M8-M11 were built prior to the applicability date of July 27, 1997.

326 IAC 8-6 (Organic Solvent Emissions Limitation)

Pursuant to 326 IAC 8-6-2, sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state, with potential emissions of 90.7 megagrams (100 tons) or greater per year of VOC, not limited by other rules in Article 8 shall not emit or cause the emission of more than 100 tons per year of VOC from any existing sources unless all VOC emitted from such source are reduced by at least 85% from emissions which would occur before the application of any control equipment or process.

The source was constructed before October 7, 1974. Therefore, the requirements of 326 IAC 8-6 do not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

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).

State Rule Applicability – Individual Facilities

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Process), the allowable particulate matter emissions from the blending operation shall be as shown below:

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Control Efficiency %	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Mixer M1	1.90	0.20	0.00%	N/A	6.30
Mixer M2	1.60	5.42	0.00%		5.62
Mixer M3	0.25	0.85	0.00%		1.62
Mixer M4	0.25	0.85	0.00%		1.62
Mixer M5	1.00	0.68	0.00%		4.10
Mixer M6	1.00	3.39	0.00%		4.10
Mixer M7	1.60	5.42	0.00%		5.62
Mixer M8	3.00	0.71	0.00%		8.56
Mixer M9	3.90	0.92	0.00%		10.20
Mixer M10	5.50	1.30	0.00%		12.85
Mixer M11	2.50	8.47	97.00%	0.25	7.58
Mixer M12	2.00	6.78	97.00%	0.20	6.52
Mixer M13	0.50	1.69	97.00%	0.05	2.58
Mixer M14	0.25	0.85	97.00%	0.03	1.62
Mixer M15	1.50	5.08	97.00%	0.15	5.38
Mixer M16	2.50	8.47	97.00%	0.25	7.58
Mixer M17	2.50	8.47	97.00%	0.25	7.58
Mixer M18	1.50	5.08	97.00%	0.15	5.38
Mixer M20	1.75	5.929	0.00%	N/A	5.97
Portable Mixer #1	0.05	2.19	0.00%		0.551
Portable Mixer #2	0.05	2.19	0.00%		0.551

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

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

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

When operating with baghouses as particulate control, mixers M11, M12, M16, and M17 are in compliance with 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Process) and particulate emissions from the rest of the blending operation are in compliance with 326 IAC 6-3-2 (see Appendix A page 1 of 6).

The two (2) portable mixers have complete enclosures; therefore, the two (2) portable mixers are in compliance with 326 IAC 6-3-2.

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter emissions from the two (2) Q/C lab drill presses and the three (3) Roll Mill/Lab Mills (RM2, RM3 and RM4) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) Q/C gelcoat spraybooth shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

This rule applies to facilities constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year.

(a) Mixers M1 through M9 were constructed in 1969, before the 326 IAC 8-1-6 applicability date of January 1, 1980. Mixers M12 through M18 and the Q/C gelcoat spraybooth (an insignificant activity) have uncontrolled potential to emit of VOC less than 25 tons per year. Therefore, 326 IAC 8-1-6 is not applicable to mixers M1 through M9, M12 through M18 and the Q/C gelcoat spraybooth.

(b) Mixer M20 has potential to emit (PTE) of VOC of greater than 25 tons per year and was constructed after 1980. However, the source has limited the amount of gelcoat produced at Mixer M20 to less than 1,666 tons per twelve (12) consecutive month period with compliance determined at the end of each month and the VOC emission rate shall be limited to 0.015 pound of VOC per pound of gelcoat produced such that the potential to emit (PTE) of VOC shall be limited to less than 25 tons per twelve (12) consecutive months. Compliance with these limits shall make the requirements of 326 IAC 8-1-6 not applicable.

(c) Pursuant to CP 099-4443-00025, issued October 30, 1995, the Best Available Control Technology (BACT) requirement of 326 IAC 8-1-6 was determined to apply to the manufacture of gelcoats in Mixers M10 and M11. BACT was determined to be a process modification without any add-on control.

Pursuant to CP 099-4443-00025, issued on October 30, 1995, the BACT has been determined to be the following:

Mixers M10 and M11 shall be configured and operated as follows:

(1) The exhaust vent shall be positioned in near proximity to the lip of each mixer, but not located on or over the mixer lid, such that VOC vaporization during product mixing is minimized; and

(2) The mixer lids shall be in place when mixing, except during raw material transfer to each mixer, sampling, and final product removal from each mixer.

Testing Requirements

Within one hundred and eighty (180) days of issuance of this permit, the Permittee shall conduct VOC testing on mixers M1 through M18 and M20 to demonstrate that the VOC emission rates from gelcoats, pastes, and cordobond are less than or equal to the VOC emission rates in Condition D.1.1. This is required for the source to demonstrate compliance with 326 IAC 2-2 (PSD Minor Limit).

Compliance Requirements

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

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

Mixers M1 through M10, M13, M14, M15, M18, M20, and the two (2) portable mixers have low allowable emissions and a control device is not required to demonstrate compliance with any applicable rules. Therefore, there are no compliance monitoring conditions included in this permit for these units.

The compliance monitoring requirements applicable to mixers M11, M12, M16, and M17 are as follows:

1. Mixers M11, M12, M16, and M17 have applicable compliance monitoring conditions as specified below:

   (a) Visible emission notations of mixers M11, M12, M16, and M17 stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall 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 startup 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop across the baghouse used in conjunction with the mixers M11, M12, M16, and M17, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. 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 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

(c) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).

(d) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the baghouses for mixers M11, M12, M16, and M17 must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this stationary manufacturing plant for the production of liquid coatings and dispersions shall be subject to the conditions of this proposed Part 70 permit T099-18688-00025.

Appendix A: Emissions Calculations
PM Emissions for Mixing Operations
Company Name: Ferro Corporation
Address City IN Zip: 1301 North Flora Street, Plymouth, IN 46563
Part 70 Permit: T099-18688-00025
Reviewer: AB / EVP
Date: April 10, 2007

	Product Mixed						**Uncontrolled Emissions**		**Controlled Emissions**	
Emissions Unit	Gel Coat	Liquid Paste	Cordobond	Maximum Batch Size, Lbs	Maximum Batch time, hrs	Control Efficiency	Potential PM Emissions (Lbs/hr)	Potential PM Emissions (tons/yr)	Potential PM Emissions (Lbs/hr)	Potential PM Emissions (tons/yr)
M1A	x		x	1000.00	4.00	0.00%	0.20	0.87	0.200	0.87
M2	x	x		3200.00	1.00	0.00%	5.42	23.74	5.421	23.74
M3	x	x		500.00	1.00	0.00%	0.85	3.71	0.847	3.71
M4	x	x		500.00	1.00	0.00%	0.85	3.71	0.847	3.71
M5A	x	x	x	2000.00	1.00	0.00%	3.39	14.84	3.388	14.84
M6	x	x		2000.00	1.00	0.00%	3.39	14.84	3.388	14.84
M7	x	x		3200.00	1.00	0.00%	5.42	23.74	5.421	23.74
M8	x			6000.00	6.75	0.00%	0.71	3.11	0.710	3.11
M9	x			7800.00	6.75	0.00%	0.92	4.04	0.923	4.04
M10	x			11000.00	6.75	0.00%	1.30	5.70	1.301	5.70
M11	x	x		5000.00	1.00	96.50%	8.47	37.10	0.296	1.30
M12		x		4000.00	1.00	96.50%	6.78	29.68	0.237	1.04
M13		x		1000.00	1.00	96.50%	1.69	7.42	0.059	0.26
M14		x		500.00	1.00	96.50%	0.85	3.71	0.030	0.13
M15		x		3000.00	1.00	96.50%	5.08	22.26	0.178	0.78
M16		x		5000.00	1.00	96.50%	8.47	37.10	0.296	1.30
M17		x		5000.00	1.00	96.50%	8.47	37.10	0.296	1.30
M18		x		3000.00	1.00	96.50%	5.08	22.26	0.178	0.78
M20		x		3500.00	1.00	0.00%	5.93	25.97	5.929	25.97
Portable Mixer #1				100.00	2.00	100.00%	0.50	2.19	0.000	0.00
Portable Mixer #2				100.00	2.00	100.00%	0.50	2.19	0.000	0.00
Potential Emissions							**74.27**	**325.28**	**29.946**	**131.16**

**Emission Factors	
lb PM / ton of Product	
Gelcoat	1.5972
Liquid paste	3.388
Cordobond	1.21
Sealer	20

** These emission factors are taken from AP-42 Chapter 6.4.

Methodology:

Shaded Cells denote the worst case product scenario for the particular piece of equipment.

Different products result in worst case PM emissions, therefore the VOC usage limitation does not apply to these PM emissions.

Potential PM Pounds per Hour = Worst Case Emission Factor x Maximum Batch Size (lbs) / Minimum Batch Time (hrs)

Potential PM Tons Per Year = Worst Case Emission Factor x Maximum Batch Size (lbs) / Minimum Batch Time (hrs) x 8760 hours/year / 2000 lbs/ton

The two (2) portable mixers have complete enclosures.

Appendix A: Emissions Calculations
VOC Emissions for Mixing Operations

Company Name: **Ferro Corporation**
Address City IN Zip: **1301 North Flora Street, Plymouth, IN 46563**
Part 70 Permit: **T099-18688.00025**
Reviewer: **AB / EVP**
Date: **April 10, 2007**

	Product Mixed					Uncontrolled Emissions		Limited Emissions (Usage Limit)	
Emissions Unit	Gel Coat	Liquid Paste	Cordobond	Maximum Batch Size, Lbs	Maximum Batch time, hrs	Potential VOC Emissions (Lbs/hr)	Potential VOC Emissions (tons/yr)	Potential VOC Emissions (Lbs/hr)	Potential VOC Emissions (tons/yr)
M1A	x		x	1000.00	1.00	20.00	87.60	5.57	24.41
M1B	x		x	3800.00	5.00	--		--	
M2	x	x		3200.00	5.00	9.60	42.05	2.67	11.71
M3	x	x		500.00	2.00	3.75	16.43	1.04	4.58
M4	x	x		500.00	2.00	3.75	16.43	1.04	4.58
M5A	x	x	x	400.00	1.00	8.00	35.04	2.23	9.76
M5B	x	x	x	2000.00	3.25	--			
M6	x	x		2000.00	3.25	9.23	40.43	2.57	11.26
M7	x	x		3200.00	5.00	9.60	42.05	2.67	11.71
M8	x			6000.00	6.75	13.33	58.40	3.71	16.27
M9	x			7800.00	6.75	17.33	75.92	4.83	21.15
M10	x			11000.00	6.75	24.44	107.07	6.81	29.83
M11	x	x		5000.00	1.00	75.00	328.50	20.90	91.52
M12		x		4000.00	1.00	0.40	1.75	0.11	0.49
M13		x		1000.00	1.00	0.10	0.44	0.03	0.12
M14		x		500.00	1.00	0.05	0.22	0.01	0.06
M15		x		3000.00	1.00	0.30	1.31	0.08	0.37
M16		x		5000.00	1.00	0.50	2.19	0.14	0.61
M17		x		5000.00	1.00	0.50	2.19	0.14	0.61
M18		x		3000.00	1.00	0.30	1.31	0.08	0.37
M20	x			3500.00	6.75	7.78	34.07	2.17	9.49
Potential Emissions			**Worst case coating added to all solvents**			**203.97**	**893.39**		**248.90**

**Emission Factors	
lb VOC / Lb Product	
Gelcoat	0.015
Liquid paste	0.0001
Cordobond	0.02

PSD Minor Limit **248.90**
Usage Limitation **27.86%**

** These emission factors are taken from AP-42 Chapter 6.4.

Methodology:

Shaded Cells denote the worst case product scenario for the particular piece of equipment.

The worst case for VOCs on blenders 1 and 5 is for Cordobond Production, listed as Case A. The worst case for HAPs for blenders 1 and 5 is for Gelcoat, listed as Case B. Therefore, the Cordobond production rates and emission factors have been used.

Potential VOC Pounds per Hour = Worst Case Emission Factor x Maximum Batch Size (lbs) / Minimum Batch Time (hrs)

Potential VOC Tons Per Year = Worst Case Emission Factor x Maximum Batch Size (lbs) / Minimum Batch Time (hrs) x 8760 hours/year / 2000 lbs/ton

Appendix A: Emissions Calculations
HAP Emissions for Mixing Operations

Company Name: **Ferro Corporation**
Address City IN Zip: **1301 North Flora Street, Plymouth, IN 46563**
Part 70 Permit: **T099-18688-00025**
Reviewer: **AB / EVP**
Date: **April 10, 2007**

	Product Mixed					**Uncontrolled Emissions**			**Limited Emissions**		
Emissions Unit	Gel Coat	Liquid Paste	Cordobond	Maximum Batch Size, Lbs	Maximum Batch time, hrs	Styrene (89.15%) (tons /Year)	Methyl Methacrylate (9.96%) (tons /Year)	Methanol (0.89%) (tons /Year)	Styrene (89.15%) (tons /Year)	Methyl Methacrylate (9.96%) (tons	Methanol (0.89%) (tons /Year)
M1B	x		x	3800.00	5.00	44.51	4.97	0.44	12.99	1.45	0.13
M2	x	x		3200.00	5.00	37.49	4.19	0.37	10.94	1.22	0.11
M3	x	x		500.00	2.00	14.64	1.64	0.15	4.27	0.48	0.04
M4	x	x		500.00	2.00	14.64	1.64	0.15	4.27	0.48	0.04
M5A	x	x	x	400.00	1.00	--	--	--			
M5B	x	x	x	2000.00	3.25	36.04	4.03	0.36	10.52	1.18	0.11
M6	x	x		2000.00	3.25	36.04	4.03	0.36	10.52	1.18	0.11
M7	x	x		100.00	5.00	1.17	0.13	0.01	0.34	0.04	0.00
M8	x			6000.00	6.75	52.06	5.82	0.52	15.20	1.70	0.15
M9	x			7800.00	6.75	67.68	7.56	0.68	19.76	2.21	0.20
M10	x			11000.00	6.75	95.45	10.66	0.95	27.86	3.11	0.28
M11	x	x		5000.00	1.00	292.86	32.72	2.92	85.49	9.55	0.85
M12		x		4000.00	1.00	1.56	0.17	0.02	0.46	0.05	0.00
M13		x		1000.00	1.00	0.39	0.04	0.00	0.11	0.01	0.00
M14		x		500.00	1.00	0.20	0.02	0.00	0.06	0.01	0.00
M15		x		3000.00	1.00	1.17	0.13	0.01	0.34	0.04	0.00
M16		x		5000.00	1.00	1.95	0.22	0.02	0.57	0.06	0.01
M17		x		5000.00	1.00	1.95	0.22	0.02	0.57	0.06	0.01
M18		x		3000.00	1.00	1.17	0.13	0.01	0.34	0.04	0.00
M20	x			3500.00	6.75	30.37	3.39	0.30	8.87	0.99	0.09
Potential Emissions			**Worst case coating added to all solvents**			**731.37**	**81.71**	**7.30**	**213.49**	**23.85**	**2.13**

** Emission Factors	
lb VOC / Lb Product	
Gelcoat	0.015
Liquid paste	0.0001
Cordobond	0.02

Total (tons/year) **820.38**

Limited HAPS **239.48**

Usage Limitatior **0.29**

** These emission factors are taken from AP-42 Chapter 6.4.

Methodology:

Shaded Cells denote the worst case product scenario for the particular piece of equipment.

The worst case for VOCs on blenders 1 and 5 is for Cordobond Production, listed as Case A. The worst case for HAPs for blenders 1 and 5 is for Gelcoat, listed as Case B. Therefore, the Cordobond production rates and emission factors have been used.

Potential VOC Pounds per Hour = Worst Case Emission Factor x Maximum Batch Size (lbs) / Minimum Batch Time (hrs)

Potential VOC Tons Per Year = Worst Case Emission Factor x Maximum Batch Size (lbs) / Minimum Batch Time (hrs) x 8760 hours/year / 2000 lbs/ton

Appendix A: Emissions Calculations

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

Company Name: **Ferro Corporation**
Address City IN Zip: **1301 North Flora Street, Plymouth, IN 46563**
Part 70 Permit: **T099-18688-00025**
Reviewer: **AB / EVP**
Date: **April 10, 2007**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.0	8.8

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.008	0.033	0.003	0.438	0.024	0.368

*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
See page 5 for HAPs emissions calculations.

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

Company Name: **Ferro Corporation**
Address City IN Zip: **1301 North Flora Street, Plymouth, IN 46563**
Part 70 Permit: **T099-18688-00025**
Reviewer: **AB / EVP**
Date: **April 10, 2007**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.198E-06	5.256E-06	3.285E-04	7.884E-03	1.489E-05

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	2.190E-06	4.818E-06	6.132E-06	1.664E-06	9.198E-06

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.

Potential Emissions from Entire source

Company Name: **Ferro Corporation**
Address City IN Zip: **1301 North Flora Street, Plymouth, IN 46563**
Part 70 Permit: **T099-18688-00025**
Reviewer: **AB / EVP**
Date: **April 10, 2007**

Unlimited Potential to Emit

Process / Emission Unit	PM	PM-10	SO2	NOx	VOC	CO	Single HAP (Styrene)	HAPS
	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)		(tons / yr)
Mixing Operations /M1-M20	325.28	325.28	0.00	0.00	852.65	0.00	292.86	820.38
Natural gas Combustion	0.01	0.03	0.00	0.44	0.02	0.37	0.00	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.80	0.00	0.00	0.00
Total	325.29	325.31	0.00	0.44	853.47	0.37	292.86	820.38

Limited Potential to Emit

Process / Emission Unit	PM	PM-10	SO2	NOx	VOC	CO	Single HAP (Styrene)	HAPS
	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)		(tons / yr)
Mixing Operations /M1-M20	131.16	131.16	0.00	0.00	248.90	0.00	85.49	239.48
Natural gas Combustion	0.01	0.03	0.00	0.44	0.02	0.37	0.00	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.80	0.00	0.00	0.00
Total	131.17	131.19	0.00	0.44	249.72	0.37	85.49	239.48