



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: April 14, 2005
RE: Daubert VCI, Inc. / 149-19123-00021
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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
FNPER.dot 1/10/05



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Daubert VCI, Inc.
1805 West Pacific Avenue
Knox, Indiana 46534**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 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.: F149-19123-00021	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 14, 2005 Expiration Date: April 14, 2010

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary coated paper production plant that is used as a metal corrosion inhibitor.

Authorized individual:	President and CEO
Source Address:	1805 West Pacific Avenue, Knox, Indiana 46534
Mailing Address:	1805 West Pacific Avenue, Knox, Indiana 46534
General Source Phone:	(574) 772-9310
SIC Code:	2672
Source Location Status:	Starke
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paper roll coating operation (identified as C-7), with a maximum throughput rate of 3,500 pounds of paper per hour, equipped with a natural gas-fired heater, with a heat input capacity of 4.8 MMBtu per hour. The heater is used for heating the coatings after their application to the paper. This facility was constructed in 1999.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) One (1) emitter coating line, with a maximum coating usage rate of 15.2 pounds per hour, using a saturation process. This line was constructed in 1999 [326 IAC 2-8].
- (b) A coating mixing operation with a maximum throughput rate of 1168 pounds of coating per hour.
- (c) Natural gas-fired combustion sources with a heat input equal to or less than ten million (10,000,000) Btu per hour and consisting of the following [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (1) One (1) natural gas-fired boiler (identified as B-1) with a maximum heat input capacity of 2.095 MMBtu per hour. This unit was constructed in 1999.
 - (2) Four (4) natural gas-fired auxiliary heaters (identified as MUA-1 through MUA-4); MUA-1 has a heat input capacity of 1.43 MMBtu per hour; MUA-2 has a heat input capacity of 1.2 MMBtu per hour; MUA-3 and MUA-4 each with a maximum heat input capacity of 3.5 MMBtu per hour.

- (3) Four (4) HVAC systems (identified as RT-1, RT-2, RT-3 and RT-5), each with a maximum heat input capacity of 0.115 MMBtu per hour.
- (4) One (1) HVAC system (identified as RT-4), with a maximum heat input capacity of 0.18 MMBtu per hour.
- (5) One (1) door heater (identified as UH-1) with a maximum heat input capacity of 0.15 MMBtu per hour.
- (d) A laboratory as defined in 326 IAC 2-7-1(21)(D)
- (e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: Brazing, soldering, and welding [326 IAC 2-7-1(21)(G)(vi)(EE)] [326 IAC 6-3].
- (f) Cleaner and solvents characterized as [326 IAC 2-7-1(21)(G)(vi)(DD)]:
 - (1) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of Hg or three-tenths (0.3) pound per square inch) measured at 38 degrees Centigrade (100 degree Fahrenheit); or
 - (2) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of Hg or one-tenth (0.1) pound per square inch) measured at 20 degrees Centigrade (68 degree Fahrenheit).
- (g) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

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

B.4 Enforceability [326 IAC 2-8-6]

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 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.
- (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 describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and local agency Northern Regional Office, within four (4) daytime business

hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Northern Regional Office
Telephone No.: 1-800-753-5519 or (219) 245-4870
Facsimile No.: (219) 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]

- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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 FESOP 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, at reasonable times, 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 at reasonable times, 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

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

- (1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

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

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

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

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.10 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be 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.17 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 2-8-4(10)]:

- (a) One (1) paper roll coating line (identified as C-7), with a maximum throughput rate of 3,500 pounds of paper per hour, equipped with a natural gas-fired heater, with a heat input capacity of 4.8 MMBtu per hour. The heater is used for heating the coatings after their application to the paper. This facility was constructed in 1999.

Insignificant Activities

- (a) One (1) emitter coating line, with a maximum coating usage rate of 15.2 pounds per hour, using a saturation process. This line was constructed in 1999 [326 IAC 2-8].

(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 2-8-4(1)]

D.1.1 Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8] [326 IAC 2-2]

Pursuant to 326 IAC 2-8 (FESOP),

- (a) The amount of VOC in coatings and inks plus the VOC in clean-up solvents used in the one (1) paper roll coating line (identified as C-7) shall be limited to less than ninety-two (92) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Any change or modification that would result in potential to emit of any single HAP and combination of HAPs greater than ten (10) and twenty-five (25) tons per year, respectively, requires prior approval from IDEM, OAQ.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (PSD) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall limit the discharge into the atmosphere of any VOC in excess of 0.35 kilograms per liter of coating (2.9 pounds VOC per gallon of coating) excluding water, delivered to the two (2) coating applicators.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, 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 and HAP usage limits for each line as established in Condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material, ink, and solvent used in each line;
 - (2) The amount of coating material, inks, and solvent used less water in each line;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings/inks and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each line;
 - (4) The total VOC and HAP usage for each line; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an authorized individual as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] – Insignificant Activities:

- (c) Natural gas-fired combustion sources with a heat input equal to or less than ten million (10,000,000) Btu per hour and consisting of the following [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (1) One (1) natural gas-fired boiler (identified as B-1) with a maximum heat input capacity of 2.095 MMBtu per hour. This unit was constructed in 1999.

(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 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the natural gas-fired boiler (identified as B-1), with a heat input capacity of 2.095 million British Thermal Units per hour (MMBtu per hour), shall be limited to 0.60 pound per MMBtu (lb per MMBtu).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] – Insignificant Activities:

- (e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: Brazing, soldering, and welding [326 IAC 2-7-1(21)(G)(vi)(EE)] [326 IAC 6-3].

(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 2-8-4(1)]

D.3.1 Particulate [40 CFR Part 52, Subpart P]

Pursuant to 40 CFR Part 52, Subpart P (Process Operations), the particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour. Therefore, the brazing, welding, and soldering equipment shall each not exceed 0.551 pounds per hour.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] – Insignificant Activities:

- (b) A coating mixing operation with a maximum throughput rate of 1168 pounds of coating per hour.
- (c) Natural gas-fired combustion sources with a heat input equal to or less than ten million (10,000,000) Btu per hour and consisting of the following [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (2) Four (4) natural gas-fired auxiliary heaters (identified as MUA-1 through MUA-4); MUA-1 has a heat input capacity of 1.43 MMBtu per hour; MUA-2 has a heat input capacity of 1.2 MMBtu per hour; MUA-3 and MUA-4 each with a maximum heat input capacity of 3.5 MMBtu per hour.
 - (3) Four (4) HVAC systems (identified as RT-1, RT-2, RT-3 and RT-5), each with a maximum heat input capacity of 0.115 MMBtu per hour.
 - (4) One (1) HVAC system (identified as RT-4), with a maximum heat input capacity of 0.18 MMBtu per hour.
 - (5) One (1) door heater (identified as UH-1) with a maximum heat input capacity of 0.15 MMBtu per hour.
- (d) A laboratory as defined in 326 IAC 2-7-1(21)(D)
- (f) Cleaner and solvents characterized as [326 IAC 2-7-1(21)(G)(vi)(DD)]:
 - (1) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of Hg or three-tenths (0.3) pound per square inch) measured at 38 degrees Centigrade (100 degree Fahrenheit); or
 - (2) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of Hg or one-tenth (0.1) pound per square inch) measured at 20 degrees Centigrade (68 degree Fahrenheit).
- (g) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

There are no specifically applicable State or Federal rules applicable to these emission units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Daubert VCI, Inc.
Source Address: 1805 West Pacific Avenue, Knox, Indiana 46534
Mailing Address: P.O. Box 479, Knox, Indiana 46534
FESOP No.: 149-19123-00021

**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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Daubert VCI, Inc.
Source Address: 1805 West Pacific Avenue, Knox, Indiana 46534
Mailing Address: P.O. Box 479, Knox, Indiana 46534
FESOP No.: 149-19123-00021

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 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
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**

FESOP Quarterly Report

Source Name: Daubert VCI, Inc.
Source Address: 1805 West Pacific Avenue, Knox, Indiana 46534
Mailing Address: P.O. Box 479, Knox, Indiana 46534
FESOP No.: 149-19123-00021
Facility: One (1) Paper Roll Coating Line
Parameter: VOC Usage
Limit: Less than ninety-two (92) tons of VOC, including the VOC usage for cleanup solvents, per twelve (12) consecutive month period, with compliance determined at the end of the each month.

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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Daubert VCI, Inc.
 Source Address: 1805 West Pacific Avenue, Knox, Indiana 46534
 Mailing Address: P.O. Box 479, Knox, Indiana 46534
 FESOP No.: 149-19123-00021

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: Daubert VCI, Inc.
Source Location: 1805 West Pacific Avenue, Knox, Indiana 46534
County: Starke
SIC Code: 2672
Operation Permit No.: F149-19123-00021
Permit Reviewer: ERG/SD

The Office of Air Quality (OAQ) has reviewed a FESOP application from Daubert VCI, Inc. relating to the operation of a stationary coated paper production plant. The coated paper product is used as a metal corrosion inhibitor.

History

The source was issued a Minor Source Operating Permit (MSOP) No: 149-10969-00021 on August 11, 1999. During the review of their existing MSOP, the Permittee discovered an error in the potential to emit calculations. The paper roll coating line (identified as C-7) utilizes a coating with a weight percent of VOC equal to 7.39 and not 2, as indicated in the MSOP. This results in potential to emit of VOC greater than 100 tons per year major source threshold level. Therefore, on May 13, 2004 the Permittee submitted an application to the OAQ requesting to limit emissions of all criteria pollutants under major source threshold levels pursuant to 326 IAC 2-8 (FESOP). The potential to emit of HAPs are less than major source threshold levels.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) paper roll coating line (identified as C-7), with a maximum throughput rate of 3,500 pounds of paper per hour, equipped with a natural gas-fired heater, with a heat input capacity of 4.8 MMBtu per hour. The heater is used for heating the coatings after their application to the paper. This facility was constructed in 1999.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units proposed for this plant during the review of this permit application.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) One (1) emitter coating line, with a maximum coating usage rate of 15.2 pounds per hour, using a saturation process. This line was constructed in 1999.
- (b) A coating mixing operation with a maximum throughput rate of 1168 pounds of coating per hour.
- (c) Natural gas-fired combustion sources with a heat input equal to or less than ten million (10,000,000) Btu per hour and consisting of the following [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (1) One (1) natural gas-fired boiler (identified as B-1) with a maximum heat input capacity of 2.095 MMBtu per hour. This unit was constructed in 1999.
 - (2) Four (4) natural gas-fired auxiliary heaters (identified as MUA-1 through MUA-4); MUA-1 has a heat input capacity of 1.43 MMBtu per hour; MUA-2 has a heat input capacity of 1.2 MMBtu per hour; MUA-3 and MUA-4 each with a maximum heat input capacity of 3.5 MMBtu per hour.
 - (3) Four (4) HVAC systems (identified as RT-1, RT-2, RT-3 and RT-5), each with a maximum heat input capacity of 0.115 MMBtu per hour.
 - (4) One (1) HVAC system (identified as RT-4), with a maximum heat input capacity of 0.18 MMBtu per hour.
 - (5) One (1) door heater (identified as UH-1) with a maximum heat input capacity of 0.15 MMBtu per hour.
- (d) A laboratory as defined in 326 IAC 2-7-1(21)(D)
- (e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: Brazing, soldering, and welding [326 IAC 2-7-1(21)(G)(vi)(EE)] [326 IAC 6-3].
- (f) Cleaner and solvents characterized as [326 IAC 2-7-1(21)(G)(vi)(DD)]:
 - (1) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of Hg or three-tenths (0.3) pound per square inch) measured at 38 degrees Centigrade (100 degrees Fahrenheit); or
 - (2) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of Hg or one-tenth (0.1) pound per square inch) measured at 20 degrees Centigrade (68 degrees Fahrenheit).
- (g) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

Existing Approvals

The source has been operating under the previous MSOP 149-10969-00021 issued on August 11, 1999, which expires on August 11, 2004.

All previous approvals are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; and therefore, were not incorporated into this FESOP permit:

All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

Enforcement Issue

IDEM is aware that the source did not apply for a FESOP in a timely manner. IDEM is reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on May 13, 2004. Additional information was received on July 23, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A , pages 1 through 9).

Unrestricted Potential to Emit of the Source

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

Pollutant	Potential to Emit (tons/year)
PM	2.99
PM10	2.99
SO ₂	0.05
VOC	378
CO	6.37
NO _x	7.58

HAPs	Potential to Emit (tons/year)
Benzene	1.59E-04
Dichlorobenzene	9.10E-05
Formaldehyde	5.69E-03
Hexane	1.37E-01
Toluene	2.58E-04
Total	0.14

- (a) The unrestricted potential emissions of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The unrestricted potential emissions of any single HAP is less than ten (10) tons per year and the unrestricted potential emissions of a combination of HAPs is less than twenty-five (25) tons per year.

- (c) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has opted to become a FESOP source. 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 this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission unit	Potential To Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
One (1) Boiler	0.07	0.07	0.01	0.05	0.77	0.92	Negligible
Coating Mixing Process	-	-	-	0.18	-	-	-
One (1) Paper Roll Coating Line	-	-	-	Less than 92.0	-	-	0.00
Emitter Coating Line	-	-	-	1.50	-	-	
Insignificant Units	2.41	2.41	-	-	-	-	
Eleven (11) Natural Gas-Fired Combustion Units	0.51	0.51	0.04	0.37	5.60	6.67	0.14
Total PTE After Issuance	2.99	2.99	0.05	Less than 94.1	6.37	7.58	Less than 10 and 25 for single and combination of HAPs, respectively

County Attainment Status

The source is located in Starke County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

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

- (c) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	2.99
PM10	2.99
SO ₂	0.05
VOC	Less than 94.1
CO	6.37
NO _x	75.8
Single HAP	<10
Combination HAPs	<25

* VOC is limited to less than 94.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month pursuant to 326 IAC 2-8 (FESOP).

This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for the natural gas-fired boiler (identified as B-1). This boiler was constructed after September 18, 1978 but has a heat input capacity less than 250 MMBtu per hour.
- (b) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for the natural gas-fired boiler (identified as B-1). This boiler was constructed after June 19, 1984 but has a heat input capacity less than 100 MMBtu per hour.
- (c) The requirements of the New Source Performance Standard, 40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for the natural gas-fired boiler (identified as B-1). This boiler has a heat input capacity less than ten (10) MMBtu per hour.
- (d) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) are not included in this permit for the three (3) volatile organic liquid storage tanks with a combined storage capacity of 5,290 gallons. The three (2) VOL storage tanks have their capacities less than 75 cubic meters (19,813 gallons).
- (e) The requirement of the New Source Performance Standard, 40 CFR Part 60, Subpart RR -Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations (326 IAC 12) are not included in this permit for the one (1) paper roll coating line (identified as C-7). This line is not used in the manufacturing of pressure sensitive tape and label materials. The coated paper is used as a metal corrosion inhibitor.

There are no other New Source Performance Standards (326 IAC 12) and 40 CFR part 60 applicable to this facility.

- (f) This requirements of the National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ were not included in this permit. This source is not a major source of hazardous air pollutants (HAPs).
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD are applicable to this source because it is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Daubert VCI, Inc. was constructed in 1999 and is not in one (1) of the twenty-eight (28) categories. At the time the source was constructed, it was a minor source under PSD because the potential to emit of PM and each criteria pollutant was less than the PSD major source threshold of 250 tons per year. On May 13, 2004, the Permittee submitted an application to OAQ requesting to operate the existing source pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP)) because the proposed change in coating usage for the one (1) paper roll coating line will result in potential to emit of VOC equal to 378 tons per year. However, pursuant to 326 IAC 2-8 (FESOP), the potential to emit of VOC from the entire source shall be limited to less than 100 tons per year.

Compliance with the 326 IAC 2-8 (FESOP) ensures a PSD minor source status for VOC. All other uncontrolled pollutants have a potential to emit less than 250 tons per year.

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

The operation of this stationary coated paper production plant does not result in potential to emit of HAPs greater than ten (10) and twenty-five (25) tons per year for single and combination of HAPs, respectively. Therefore, the requirements of 326 IAC 2-4.1 are not applicable to this source.

326 IAC 2-6 (Emission Reporting)

This source is located in Starke County. Although the potential to emit of VOC is greater than one hundred (100) tons per year, the Permittee has opted to operate the source under the provisions of 326 IAC 2-8 (FESOP) which limits the potential to emit of VOC to less than 100 tons per year. Therefore, the source is not required to operate under a Part 70 Permit and the provisions of 326 IAC 2-6 do not apply.

326 IAC 2-8 (FESOP)

The potential to emit of VOC from the entire source is greater than one hundred (100) tons per year. Pursuant to 326 IAC 2-8-4, and in order to limit the source to less than one hundred (100) tons per year of VOC:

- (a) The amount of VOC in coating and inks plus the VOC in clean-up solvents used in the one (1) paper roll coating line (identified as C-7) shall be limited to less than ninety-two (92) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Any change or modification that would result in potential to emit of any single HAP and combination of HAPs greater than ten (10) and twenty-five (25) tons per year, respectively, requires prior approval from IDEM, OAQ.

These limits ensure that VOC emissions from the entire source are less than one hundred (100) tons per year and renders 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.

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 for sources shall meet the following, unless otherwise stated in this permit:

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

State Rule Applicability - Paper Roll Coating Line, Emitter Coating Line

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

Although constructed after the January 1, 1980 applicability date for this rule, the one (1) paper roll coating line (identified as C-7) is not subject to the provisions of 326 IAC 8-1-6 because this facility is currently subject to 326 IAC 8-2-5. Facilities that are subject to any other Article 8 rule are exempt from the requirements of 326 IAC 8-1-6.

326 IAC 8-2-5 (Paper Coating Operations)

The one (1) paper roll coating line (identified as C-7) and the one (1) emitter coating line are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because these facilities utilize the saturation process of paper to apply coating.

Pursuant to this rule, the Permittee shall limit the discharge into the atmosphere of any VOC in excess of 0.35 kilograms per liter of coating (2.9 pounds VOC per gallon of coating), excluding water, delivered to the two (2) coating applicators.

Based on the pounds VOC per gallon of coating calculation for the one (1) paper roll coating line as shown on Page 9 of 9 the TSD, Appendix A, the Permittee is in compliance with this limit.

326 IAC 6-3-2 (Process Operations)

The one (1) paper roll coating line and the one (1) emitter coating line are not subject to the provisions of this rule because these lines utilize paper saturation processes that do not result in particulate emissions.

State Rule Applicability - Boiler

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

Pursuant to 326 IAC 6-2-4(a)(Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the one (1) natural gas fired boiler (identified as B-1) with maximum heat input capacity of 2.095 MMBtu per hour, which was existing and in operation after September 21, 1983, was calculated to be 0.64 pounds of MMBtu heat input, respectively.

This limitation is based on the following equation:

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

where:

Pt = pounds of particulate matter emitted per million Btu (lbs/MMBtu)
Q = total source heat input capacity rating in MMBtu per hour

However, 326 IAC 6-2-4(a) also states that for boilers with heat input capacity less than 10 MMBtu per hour, the pounds of particulate matter emitted per million Btu heat input shall not exceed 0.6 pounds per MMBtu. Since 0.6 pounds per MMBtu heat input is less than the limit calculated above for boiler B-1, boiler B-1 shall be limited to 0.6 pounds of particulate matter per MMBtu heat input.

State Rule Applicability - Coating Mixing Process

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

The potential VOC emissions from the coating mixing process is less than twenty-five (25) tons per year. Therefore, it is not subject to the provisions of 326 IAC 8-1-6.

326 IAC 6-3-2 (Process Operations)

The coating mixing process is not subject to the provisions of 326 IAC 6-3-2 because this process does not result in particulate emissions.

State Rule Applicability - Storage Tanks Used in Conjunction with the Coating Mixing Process

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

The three (3) storage tanks are not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is not located in any of the listed counties under 326 IAC 8-9-1(a).

326 IAC 12 (New Source Performance Standards)

Pursuant to 326 IAC 12 and 326 IAC 1-1-3, storage tanks which store organic liquids must be reviewed pursuant to the July 1, 2000 version of 40 CFR Part 60, Subpart Kb. As a result, the three (3) storage tanks were reviewed under the requirements of 326 IAC 12. The tanks have a capacity less than 40 m³ (10,567 gallons). Therefore, they are not are not subject to the requirements of 326 IAC 12 and 326 IAC 1-1-3.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Therefore, the brazing, welding, and soldering equipment shall each not exceed 0.551 pounds per hour. The above limit shall be valid until revisions to rule 326 IAC 6-3-1 (Particulate Emissions Limitation for Manufacturing Processes) are approved by the EPA into the SIP.

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

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

326 IAC 8-3-1 (Organic Solvent Degreasing Operation)

The cleaners and solvents used at the source (insignificant activity) are not subject to the provisions of 326 IAC 8-3-1 because they do not fall under any of the operations associated with degreasing.

Testing Requirements

The Permittee is not required to test the one (1) paper roll coating line (identified as C-7) and the one (1) emitter coating line by this permit because the Permittee is required to maintain records of VOCs. However, IDEM, OAQ may require compliance tests at any specific time when necessary

to determine if the two lines are in compliance. If testing is required by IDEM, OAQ, the Permittee shall perform VOC testing for these facilities utilizing methods as approved by the Commissioner.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no compliance monitoring requirements applicable to this source.

Conclusion

The operation of this stationary coated paper production plant shall be subject to the conditions of FESOP 149-19123-00021.

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

Addendum to the Technical Support Document (TSD) for the
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Daubert VCI, Inc.
Source Location:	1805 West Pacific Avenue, Knox Indiana, 46534
County:	Starke
Permit No.:	F149-19123-00021
SIC Code:	2672
Permit Reviewer:	ERG/SD

On December 14, 2004, the Office of Air Quality (OAQ) had a notice published in The Knox Leader and Review, in Knox, Indiana, stating that Daubert VCI had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a coated paper production plant.

The notice also stated that the OAQ proposed to issue this permit and provided information on how the public could review the draft permit and other documentation. Finally, the noticed informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued.

On December 30, 2004, IDEM received a letter from a concerned citizen requesting a public hearing. IDEM staff attempted to contact the citizen by telephone to answer any questions she may have about the draft permit, and to discuss if a hearing would be the best way to address her concerns. IDEM was unable to reach her by telephone, and wrote a letter asking her to call us to discuss her concerns regarding the draft permit. IDEM did not receive a response to either a telephone message or the letter.

Because only one person requested a hearing, and IDEM was unable to contact this person, IDEM did not conduct a hearing, and no changes we made to the permit.

**Appendix A: Emission Calculations
One (1) Boiler**

Company Name: Daubert VCI, Inc.
Address: 1805 West Pacific Avenue, Knox, Indiana 46534
FESOP: 149-19123
Plt ID: 149-00021
Reviewer: ERG/SD
Date: July 21, 2004

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

2.10 (1 Unit Total)

18

Pollutant

	* PM	* PM10	SO ₂	** NOx	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.07	0.07	0.01	0.92	0.05	0.77

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

** Emission factor for NOx (Uncontrolled) = 100 lb/MMCF.

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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

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

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
One (1) Boiler**

Company Name: Daubert VCI, Inc.
Address: 1805 West Pacific Avenue, Knox, Indiana 46534
FESOP: 149-19123
Plt ID: 149-00021
Reviewer: ERG/SD
Date: July 21, 2004

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	1.93E-05	1.10E-05	6.88E-04	1.65E-02	3.12E-05

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	4.59E-06	1.01E-05	1.28E-05	3.49E-06	1.93E-05

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations
Natural Gas-Fired Combustion Units**

Company Name: Daubert VCI, Inc.
Address: 1805 West Pacific Avenue, Knox, Indiana 46534
FESOP: 149-19123
Plt ID: 149-00021
Reviewer: ERG/SD
Date: July 21, 2004

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

15.2 (11 Units Total)

133

Pollutant

	* PM	* PM10	SO ₂	** NOx	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.51	0.51	0.04	6.67	0.37	5.60

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

** Emission factor for NOx (Uncontrolled) = 100 lb/MMCF.

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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

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

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas-Fired Combustion Units**

Company Name: Daubert VCI, Inc.
Address: 1805 West Pacific Avenue, Knox, Indiana 46534
FESOP: 149-19123
Plt ID: 149-00021
Reviewer: ERG/SD
Date: July 21, 2004

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	1.40E-04	8.00E-05	5.00E-03	1.20E-01	2.27E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	3.33E-05	7.33E-05	9.33E-05	2.53E-05	1.40E-04

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations
VOC Emissions
From Coating Mixing Process**

Company Name: Daubert VCI, Inc.
Address: 1805 West Pacific Avenue, Knox, Indiana 46534
FESOP: 149-19123
Plt ID: 149-00021
Reviewer: ERG/SD
Date: July 21, 2004

Coating Name	Batch Size (gallons)	Density (lb/gal)	Weight % VOC	VOC Emissions (tons/year) From		
				Loading of Tanks	Heat-up Losses	Product Mixing
H39	2620	9.04	2.53%	0.06975	0.00027	0.11
CC Coating	2620	9.95	7.39%			
EMI	50	9.30	2.26%			

5290

TOTAL Emissions (tons/year) = 0.18

Note:

VOC Emissions from Coating Manufacturing Process were provided by the Permittee.
 VOC emissions are calculated using methodologies specified in the U.S. EPA document developed by the Emission Inventory Improvement Program from Volume II, Chapter 8 titled " Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", Revised Final August 2 March 14, 2002.

**Appendix A: Emission Calculations
VOC Emissions
From one (1) Paper Roll Coater**

Company Name: Daubert VCI, Inc.
Address: 1805 West Pacific Avenue, Knox, Indiana 46534
FESOP: 149-19123
Plt ID: 149-00021
Reviewer: ERG/SD
Date: July 21, 2004

POTENTIAL TO EMIT OF VOC FROM COATING USAGE

Emission Unit	Max. Throughput Rate (feet/min)	Area per Ream (feet ²)	Width of Ream (feet)	Max. Coating Usage (lb coating/Ream)	Weight % VOC	PTE of VOC (lb/hour)	PTE of VOC (tons/year)
Paper Roll Coater	600	3000	4.0	24.0	7.39%	85.1	373

Note 1: Coating is applied using roll coating method. Therefore there are no PM/PM10 emissions from this process.

Note 2: The coatings used at this facility does not contain any HAPs.

METHODOLOGY

PTE of VOC (lb/hour) = Max. throughput rate (ft/min) * 1/Area per ream (ft²) * Width of ream (ft) * Max. coating usage (lb coating/ream) * Weight % VOC * 60 min/hour

PTE of VOC (ton/year) = Max. throughput rate (ft/min) * 1/Area per ream (ft²) * Width of ream (ft) * Max. coating usage (lb coating/ream) * Weight % VOC * 60 min/hour * 87

POTENTIAL TO EMIT OF VOC FROM INK USAGE

Emission Unit	Max. Ink Usage Rate (lb/year)	Weight % VOC	PTE of VOC (lb/hour)	PTE of VOC (tons/year)
Paper Roll Coater	100000	5.50%	0.628	2.75

Note 3: The ink used in the paper roll coater does not contain any HAPs.

METHODOLOGY

PTE of VOC (lb/hour) = Max. ink usage rate (lb/year) * Weight % VOC * 1year/8760 hours

PTE of VOC (ton/year) = Max. ink usage rate (lb/year) * Weight % VOC * 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC Emissions
From One (1) Emitter Coating Line**

Company Name: Daubert VCI, Inc.
Address: 1805 West Pacific Avenue, Knox, Indiana 46534
FESOP: 149-19123
Plt ID: 149-00021
Reviewer: ERG/SD
Date: July 21, 2004

Emission Unit	Max. Coating Usage Rate (lb/hour)	Weight % VOC	PTE of VOC (lb/hour)	PTE of VOC (tons/year)
Emitter Coating Line	15.2	2.26%	0.34	1.50

Note 1: Coating is applied by a saturation process. Therefore, there are no PM/PM10 emissions.

Note 2: The coating used in the emitter coating line does not contain any HAPs.

METHODOLOGY

PTE of VOC (lb/hour) = Max. coating usage rate (lb/hour) * Weight % VOC

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

**Appendix A: Emissions Calculations
Summary**

Company Name: Daubert VCI, Inc.
Address: 1805 West Pacific Avenue, Knox, Indiana 46534
FESOP: 149-19123
Plt ID: 149-00021
Reviewer: ERG/SD
Date: July 21, 2004

POTENTIAL TO EMIT IN TONS PER YEAR

	PM	PM10	SO₂	NO_x	VOC	CO	HAP
1 Boiler	0.07	0.07	0.01	0.92	0.05	0.77	0.02
11 Natural Gas-Fired Combustion Units	0.51	0.51	0.04	6.67	0.37	5.60	0.13
Coating Mixing Process					0.18		
1 Paper Roll Coater Line					376		
Emitter Coating Line					1.50		
Insignificant Activites	2.41	2.41					
TOTAL	2.99	2.99	0.05	7.58	378	6.37	0.14

LIMITED POTENTIAL TO EMIT IN TONS PER YEAR

	PM	PM10	SO₂	NO_x	VOC	CO	HAP
1 Boiler	0.07	0.07	0.01	0.92	0.05	0.77	0.02
11 Natural Gas-Fired Combustion Units	0.51	0.51	0.04	6.67	0.37	5.60	0.13
Coating Mixing Process					0.18		
1 Paper Roll Coater Line					92.0		
Emitter Coating Line					2.00		
Insignificant Activites	2.41	2.41					
TOTAL	2.99	2.99	0.05	7.58	94.6	6.37	0.14