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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 18, 2007

RE: Royal Adhesives & Sealants, LLC / 141-19496-00146

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

Notice of Decision: Approval – Effective Immediately

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

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

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

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

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

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

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

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

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

Enclosures
FNTVOP.dot 03/23/06

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Royal Adhesives & Sealants, L.L.C.
2001 West Washington Street
South Bend, Indiana 46628

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.
This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: 141-19496-00146	
Original signed by: Nisha Sizemore, Chief Permit Branch Office of Air Quality	Issuance Date: January 18, 2007 Expiration Date: January 18, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary sealant and adhesive manufacturing plant.

Responsible Official:	Vice President of Operations
Source Address:	2001 West Washington Street, South Bend, IN 46628
Mailing Address:	2001 West Washington Street, South Bend, IN 46628
General Source Phone Number:	(574) 246-5000
SIC Code:	2891
County Location:	St. Joseph
Source Location Status:	Basic nonattainment for 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Major Source, under Emission Offset Rules Major Source, Section 112 of the Clean Air Act

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

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

(a) The following adhesive and sealant churns, each containing a nitrogen blanket purging system which is integral to the churning process, each exhausting to its respective vent and equipped with its respective condenser for VOC control. These emissions units are affected units under 40 CFR 63, Subpart HHHHH:

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Sealant CH-7	S-7	CE-7	November 1996	210
Sealant CH-8	S-8	CE-8	November 1996	210
Sealant CH-9	S-9	CE-9	June 1998	900
Sealant CH-10	S-10	CE-10	June 1998	900
Sealant CH-28	S-28	CE-28	April 2003	500
Sealant CH-53	S-53	CE-53	November 1996	500

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Adhesive CH-1	S-1	CE-1	November 1996	330
Adhesive CH-2	S-2	CE-2	November 1996	330
Adhesive CH-3	N/A	N/A	November 1996	55
Adhesive CH-22	S-22	CE-22	June 1998	2,000
Adhesive CH-25	S-25	CE-25	April 1999	750
Adhesive CH-26	S-26	CE-26	November 1996	1,500
Adhesive CH-27	S-27	CE-27	March 2001	1,522
Adhesive CH-29	S-29	CE-29	May 2005	3,000
Adhesive CH-54	S-54	CE-54	November 1996	550
Adhesive CH-55	S-55	CE-55	November 1996	560
Adhesive CH-56	S-56	CE-56	November 1996	600

The sealant churns above have a combined maximum production capacity of 1,230 lbs/hr, and the adhesive churns have a combined maximum production capacity of 9,203 lbs/hr. The source will utilize a cartridge type dust collector, identified as DC-3, with 18 cartridges to control PM emissions from sealant churns CH-7, CH-8, and adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-54, CH-55, and CH-56. The dust collector flowrate is 12,000 cubic feet per minute (cfm).

The following emission units (items (b) – (h)) are subject to the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing Requirements [40 CFR Part 63, Subpart HHHHH]:

(b) A five and three gallon adhesive canning line, with a maximum production of 8,291 lb/hr, with no VOC control, constructed in April 1997;

(c) A one gallon adhesive canning line, with a maximum production of 3,238 lb/hr, with no VOC control, constructed in April 1997;

(d) Two (2) tube filling systems: a double-head system, and a high-speed-single-head system. These systems have a combined maximum production capacity of 3,627 lbs/hr, with no VOC control;

(e) A VOL storage tank, identified as ST-11, with a volume of less than 40 cubic meters but greater than 1,000 gallons, erected in 1987 but not yet constructed/used, with pressure venting to the atmosphere and no emission control;

(f) Two (2) Volatile Organic Liquid (VOL) storage tanks, identified as ST-1 and ST-4, each with a volume of 95 cubic meters and a vapor pressure less than 15.0 kiloPascals, constructed in 1986, with pressure venting to the atmosphere and no emission control;

(g) Six (6) VOL storage tanks, identified as ST-2, ST-3, ST-5, ST-6, ST-7 and ST-8, each with a volume of 57 cubic meters, constructed in 1986, with pressure venting to the atmosphere and no emission control;

(h) Two (2) VOL storage tanks, identified as ST-9 and ST-10, each with a volume of less than 40 cubic meters but greater than 1,000 gallons, constructed in 1987, with pressure venting to the atmosphere and no emission control;

(i) Three (3) baghouse dust collectors, identified as DC-1, DC-2, and DC-3, designed to control particulate matter emissions from all facilities except for VOL storage tanks ST-1 through ST-11.

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

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

(a) Two (2) natural gas fired boilers, each installed in February 1997, and identified as B-1 and B-2, each rated at 1.68 million British Thermal Units per hour (MMBtu/hr), and exhausting to stacks SB-1 and SB-2, respectively. [326 IAC 6-2-4]

The following insignificant activities (items (b) – (h)) are subject to the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing Requirements [40 CFR Part 63, Subpart HHHHH]:

(b) Volatile Organic Compound (VOC) and Hazardous Air Pollution (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons;

(c) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs, including:

Piping losses using standard SOCMI factors for non-leaking pipes, valves, and pumps for raw materials in VOL storage tanks: ST-1, ST-4, ST-2, ST-3, ST-5, ST-6, ST-7, ST-8, ST-10, ST-11 and ST-12, and holding tanks: T1, T2, T3, T4, T5, T7, T9, T10, T11.

(d) The following adhesive holding tanks, each with the potential to emit (PTE) of less than 1 ton single HAP/year, less than 2.5 tons of a combination of HAPs/year, and less than 10 tons VOC/year, with uncontrolled emissions from conservation vents:

Holding Tank Content, ID	Installation Date	Maximum Capacity (gal)
Adhesive T-1	January 1997	6,000
Adhesive T-2	January 1997	6,000
Adhesive T-3	January 1997	3,000
Adhesive T-4	January 1997	3,000
Adhesive T-5	January 1997	3,000
Adhesive T-9	January 1997	3,000

The adhesive holding tanks have a combined throughput of 11,529 lbs/hr.

(e) Two (2) sealant holding tanks, identified as T-10 and T-11, each with a volume of 3,000 gallons, each with the potential to emit (PTE) of less than 1 ton single HAP/year, less than 2.5 tons of a combination of HAPs/year, and less than 10 tons VOC/year, which to date have not been installed;

(f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(g) A VOL storage tank, identified as ST-12, with a volume of less than 40 cubic meters but greater than 1,000 gallons, with pressure venting to the atmosphere and no emission control; and

(h) Activities with VOC emissions equal to or less than 3 lbs/hour or 15 lbs/day, including:

(1) A manually operated five/fifty-five gallon sealant pail/drum line, with a maximum production capacity of 1,914 lb/hr, constructed in 1997; and

(2) A manually operated five/fifty-five gallon adhesive pail/drum line, with a maximum production capacity of 1,820 lb/hr, constructed in 1997.

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, 141-19496-00146, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15th of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(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
Indianapolis, Indiana 46204-2251

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to 141-19496-00146 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

(d) Alternative Operating Scenarios Part 70 Operating Permit
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.
The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement the parameters.

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

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

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 30, 1998.

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

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

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

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

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

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

(1) initial inspection and evaluation

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

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

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test Part 70 Operating Permit

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

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

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

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

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

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

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

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

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

Stratospheric Ozone Protection

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

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) The following adhesive and sealant churns, each containing a nitrogen blanket purging system which is integral to the churning process, each exhausting to its respective vent and equipped with its respective condenser for VOC control. These emissions units are affected units under 40 CFR 63, Subpart HHHHH:

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Sealant CH-7	S-7	CE-7	November 96	210
Sealant CH-8	S-8	CE-8	November 96	210
Sealant CH-9	S-9	CE-9	June 98	900
Sealant CH-10	S-10	CE-10	June 98	900
Sealant CH-28	S-28	CE-28	April 03	500
Sealant CH-53	S-53	CE-53	November 96	500
Adhesive CH-1	S-1	CE-1	November 96	330
Adhesive CH-2	S-2	CE-2	November 96	330
Adhesive CH-3	N/A	N/A	November 96	55
Adhesive CH-22	S-22	CE-22	June 98	2,000
Adhesive CH-25	S-25	CE-25	April 99	750
Adhesive CH-26	S-26	CE-26	November 96	1,500
Adhesive CH-27	S-27	CE-27	March 2001	1,522
Adhesive CH-29	S-29	CE-29	May 2005	3,000
Adhesive CH-54	S-54	CE-54	November 96	550
Adhesive CH-55	S-55	CE-55	November 96	560
Adhesive CH-56	S-56	CE-56	November 96	600

The sealant churns above have a combined maximum production capacity of 1,230 lbs/hr, and the adhesive churns have a combined maximum production capacity of 9,203 lbs/hr. The source will utilize a cartridge type dust collector, identified as DC-3, with 18 cartridges to control PM emissions from sealant churns CH-7, CH-8, and adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-54, CH-55, and CH-56. The dust collector flowrate is 12,000 cubic feet per minute (cfm).

The following emission unit (items b) is an affected units under 40 CFR 63, Subpart HHHHH:

(b) A five and three gallon adhesive canning line, with a maximum production of 8,291 lb/hr, with no VOC control, constructed in April 97.

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

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

D.1.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

(a) The total time of nitrogen purging for each batch is limited to 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, CH-28 and CH-53, 10 minutes/batch for adhesive churns CH-1, CH-2 and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55 and CH-56, and 45 minutes/batch for adhesive churns CH-29 and CH-27. The maximum number of batches per day is limited to 1 batch per day for sealant churns CH-7, CH-8, CH-9, CH-10, CH-28 and CH-53 and adhesive churns CH-1, CH-2, CH-22, CH-27, CH-29 and CH-54, 2 batches per day for adhesive churn 3 and 6 batches per day for adhesive churns CH-25, CH-26, CH-55 and CH-56.

(b) VOC input to the five and three gallon adhesive canning process shall be limited to less than 19,111 tons of VOC per 12 consecutive month period. This VOC input limitation will limit VOC emissions from the five and three gallon adhesive canning line to less than 25 tons per 12 consecutive month period.

Compliance with these limits renders 326 IAC 8-1-6 (BACT) not applicable.

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

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within 180 days after issuance of this permit, in order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform VOC testing for the adhesive and sealant churns to verify emission factors, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.3 Volatile Organic Compound (VOC) Control

In order to comply with Condition D.1.1, the nitrogen purging systems, which are integral to the process and provide enclosure during the churning process, except during intermittent periods of nitrogen purging, and the condensers for the solvent churns shall be in operation and control emissions from the solvent-based production processes at all times the solvent-based production processes are in operation.

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

Compliance with the VOC content and usage limitations contained in Condition D.1.1(b) 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”, or Material Safety Data Sheets (MSDS), and “as applied” VOC 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.

D.1.5 Solvent-based Churns

Adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-26, CH-27, CH-29, CH-54, CH-55, CH-56, and solvent-based sealant churns CH-9, CH-10, CH-7, CH-8, CH-28, CH-53, each of which contain a nitrogen blanket purging system which is integral to the mixing process, have applicable compliance monitoring conditions as specified below:

(a) Once each calendar year, the source shall observe and record the number of minutes during an entire cycle of mixing that each adhesive churn and each sealant churn purges when mixing a worst-case formula for that churn.

(b) Such records shall include identification of the churn, identification of formula, batch size, total number of hours churned, and total number of minutes that purging occurred. Such records shall remain on site for 5 years.

These monitoring conditions are necessary to ensure that maximum total minutes for batch purging shall remain no greater than 10 minutes/batch for adhesive churns CH-1, CH-2, and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55, and CH-56, 45 minutes/batch for adhesive churns CH-29 and CH-27, and 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, CH-28, and CH-53, so that potential VOC emission will remain less than 25 tons/year and 326 IAC 8-1-6 (BACT) will not apply.

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

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(b), the Permittee shall record the VOC input to the five and three gallon adhesive canning process. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established for the five and three gallon adhesive canning process in Condition D.1.1(b).

(b) To document compliance with Condition D.1.1(a), the Permittee shall maintain the following records. Records shall be complete and sufficient to establish compliance with the VOC emission limits established for each of the adhesive and sealant churns in Condition D.1.1(a).

(1) The purging time per batch and the number of batches per day for each churn;

(2) The number of batches per month for each churn; and

(3) Total VOC emissions per month for each churn.

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

D.1.7 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) Two (2) natural gas fired boilers, each installed in February 1997, and identified as B-1 and B-2, each rated at 1.68 million British Thermal Units per hour (MMBtu/hr), and exhausting to stacks SB-1 and SB-2, respectively (326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)).

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

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

D.2.1 Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), for indirect heat exchangers with a maximum operating capacity rating of less than 10 MMBtu per hour and constructed after September 21,1983, PM emissions shall not exceed 0.6 pounds per MMBtu heat input. Therefore, the PM emissions from each of the two (2) boilers shall be limited to 0.60 pounds per MMBtu heat input.

SECTION D.3 EMISSIONS UNITS OPERATION CONDITIONS

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

(a) The following adhesive and sealant churns, each containing a nitrogen blanket purging system which is integral to the churning process, each exhausting to its respective vent and equipped with its respective condenser for VOC control. These emissions units are affected units under 40 CFR 63, Subpart HHHHH:

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Sealant CH-9	S-9	CE-9	June 98	900
Sealant CH-10	S-10	CE-10	June 98	900
Sealant CH-28	S-28	CE-28	April 03	500
Sealant CH-53	S-53	CE-53	November 96	500
Adhesive CH-1	S-1	CE-1	November 96	330
Adhesive CH-2	S-2	CE-2	November 96	330
Adhesive CH-22	S-22	CE-22	June 98	2,000
Adhesive CH-25	S-25	CE-25	April 99	750
Adhesive CH-26	S-26	CE-26	November 96	1,500
Adhesive CH-27	S-27	CE-27	March 2001	1,522
Adhesive CH-29	S-29	CE-29	May 2005	3,000
Adhesive CH-54	S-54	CE-54	November 96	550
Adhesive CH-55	S-55	CE-55	November 96	560
Adhesive CH-56	S-56	CE-56	November 96	600

The following emission units (items (b) – (o)) are affected units under 40 CFR 63, Subpart HHHHH:

(b) A five and three gallon adhesive canning line, with a maximum production of 8,291 lb/hr, with no VOC control, constructed in April 97;

(c) A one gallon adhesive canning line, with a maximum production of 3,238 lb/hr, with no VOC control, constructed in April 97;

(d) Two (2) tube filling systems: a double-head system, and a high-speed-single-head system. These systems have a combined maximum production capacity of 3,627 lbs/hr, with no VOC control;

(e) A VOL storage tank, identified as ST-11, with a volume of less than 40 cubic meters but greater than 1,000 gallons, erected in 1987 but not yet constructed/used, with pressure venting to the atmosphere and no emission control;

(f) Two (2) Volatile Organic Liquid (VOL) storage tanks, identified as ST-1 and ST-4, each with a volume of 95 cubic meters and a vapor pressure less than 15.0 kiloPascals, constructed in 1986, with pressure venting to the atmosphere and no emission control;

(g) Six (6) VOL storage tanks, identified as ST-2, ST-3, ST-5, ST-6, ST-7 and ST-8, each with a volume of 57 cubic meters, constructed in 1986, with pressure venting to the atmosphere and no emission control;

(h) Two (2) VOL storage tanks, identified as ST-9 and ST-10, each with a volume of less than 40 cubic meters but greater than 1,000 gallons, constructed in 1987, with pressure venting to the atmosphere and no emission control.

(i) Volatile Organic Compound (VOC) and Hazardous Air Pollution (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons;

(j) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs, including:

Piping losses using standard SOCMI factors for non-leaking pipes, valves, and pumps for raw materials in VOL storage tanks: ST-1, ST-4, ST-2, ST-3, ST-5, ST-6, ST-7, ST-8, ST-10, ST-11 and ST-12, and holding tanks: T1, T2, T3, T4, T5, T7, T9, T10, T11.

(k) The following adhesive holding tanks, each with the potential to emit (PTE) of less than 1 ton single HAP/year, less than 2.5 tons of a combination of HAPs/year, and less than 10 tons VOC/year, with uncontrolled emissions from conservation vents:

Adhesive T-1; Adhesive T-2; Adhesive T-3; Adhesive T-4; Adhesive T-5; and Adhesive T-9;

(l) Two (2) sealant holding tanks, identified as T-10 and T-11, each with a volume of 3,000 gallons, each with the potential to emit (PTE) of less than 1 ton single HAP/year, less than 2.5 tons of a combination of HAPs/year, and less than 10 tons VOC/year, which to date have not been installed;

(m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(n) A VOL storage tank, identified as ST-12, with a volume of less than 40 cubic meters but greater than 1,000 gallons, with pressure venting to the atmosphere and no emission control;

(o) Activities with VOC emissions equal to or less than 3 lbs/hour or 15 lbs/day, including:

(1) A manually operated five/fifty-five gallon sealant pail/drum line, with a maximum production capacity of 1,914 lb/hr, constructed in 1997; and

(2) A manually operated five/fifty-five gallon adhesive pail/drum line, with a maximum production capacity of 1,820 lb/hr, constructed in 1997.

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

Emission Limitations and Standards

D.3.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for process vessels, storage tanks for feedstocks or products, and components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems associated with miscellaneous coating manufacturing operations, as listed above, and their associated air pollution control devices (condenser for VOC and HAP control).

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

D.3.2 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63, Subpart HHHHH, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for process vessels, storage tanks for feedstocks or products, and components, as specified in Appendix A – Table 10 of 40 CFR Part 63, Subpart HHHHH in accordance with schedule in 40 CFR 63 Subpart HHHHH.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance Branch
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

D.3.3 National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing Requirements [40 CFR Part 63, Subpart HHHHH]

Pursuant to 40 CFR Part 63, Subpart HHHHH, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart HHHHH, for process vessels, storage tanks for feedstocks or products, and components associated with miscellaneous coating manufacturing operations, as specified as follows:

§ 63.7980 What is the purpose of this subpart?

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

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

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

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

(2) Manufacture coatings as defined in §63.8105.

(3) Process, use, or produce HAP.

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

(b) Miscellaneous coating manufacturing operations include the facilitywide collection of equipment described in paragraphs (b)(1) through (4) of this section that is used to manufacture coatings as defined in §63.8105. Miscellaneous coating manufacturing operations also include cleaning operations.

(1) Process vessels.

(2) Storage tanks for feedstocks and products.

(3) Components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems.

(c) If the predominant use of a transfer rack loading arm or storage tank (including storage tanks in series) is associated with miscellaneous coating manufacturing, and the loading arm or storage tank is not part of an affected source under a subpart of this part 63, then you must assign the loading arm or storage tank to the miscellaneous coating manufacturing operations. If the predominant use cannot be determined, and the loading arm or storage tank is not part of an affected source under a subpart of this part 63, then you must assign the loading arm or storage tank to the miscellaneous coating manufacturing operations. If the use varies from year to year, then you must base the determination on the utilization that occurred during the year preceding December 11, 2003 or, if the loading arm or storage tank was not in operation during that year, you must base the use on the expected use for the first 5-year period after startup. You must include the determination in the notification of compliance status report specified in §63.8075(d). You must redetermine the predominant use at least once every 5 years after the compliance date.

(d) The requirements for miscellaneous coatings manufacturing sources in this subpart do not apply to operations described in paragraphs (d)(1) through (4) of this section.

(3) Ancillary equipment such as boilers and incinerators (only those not used to comply with the emission limits in Tables 1 through 5 to this subpart), chillers and refrigeration systems, and other equipment that is not directly involved in the manufacturing of a coating (*i.e.,* it operates as a closed system, and materials are not combined with materials used to manufacture the coating).

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

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

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

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

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

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

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

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

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

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

(d) *Exceptions to the requirements specified in other subparts of this part 63*—(1) *Requirements for performance tests.* The requirements specified in paragraphs (d)(1)(i) through (v) of this section apply instead of or in addition to the requirements for performance testing of control devices as specified in subpart SS of 40 CFR part 63.

(i) Conduct gas molecular weight analysis using Method 3, 3A, or 3B in appendix A to 40 CFR part 60.

(ii) Measure moisture content of the stack gas using Method 4 in appendix A to 40 CFR part 60.

(iii) As an alternative to using Method 18, Method 25/25A, or Method 26/26A of 40 CFR part 60, appendix A, to comply with any of the emission limits specified in Tables 1 through 6 to this subpart, you may use Method 320 of 40 CFR part 60, appendix A. When using Method 320, you must follow the analyte spiking procedures of section 13 of Method 320, unless you demonstrate that the complete spiking procedure has been conducted at a similar source.

(iv) Section 63.997(c)(1) does not apply. For the purposes of this subpart, results of all initial compliance demonstrations must be included in the notification of compliance status report, which is due 150 days after the compliance date, as specified in §63.8075(d)(1).

(v) If you do not have a closed-vent system as defined in §63.981, you must determine capture efficiency using Method 204 of appendix M to 40 CFR part 51 for all stationary process vessels subject to requirements of Table 1 to this subpart.

(6) *Startup, shutdown, and malfunction.* Sections 63.998(b)(2)(iii) and (b)(6)(i)(A), which apply to the exclusion of monitoring data collected during periods of startup, shutdown, and malfunction (SSM) from daily averages, do not apply for the purposes of this subpart.

(7) *Reporting.* (i) When §§63.8005 through 63.8025 reference other subparts in this part 63 that use the term periodic report, it means compliance report for the purposes of this subpart.

(ii) When there are conflicts between this subpart and referenced subparts for the due dates of reports required by this subpart, reports must be submitted according to the due dates presented in this subpart.

(iii) Excused excursions, as defined in subpart SS of 40 CFR part 63, are not allowed.

§ 63.8005 What requirements apply to my process vessels?

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

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

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

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

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

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

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

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

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

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

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

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

§ 63.8010 What requirements apply to my storage tanks?

(a) You must meet each emission limit in Table 2 to this subpart that applies to your storage tanks, and you must meet each applicable requirement specified in §63.8000(b). For each control device used to comply with Table 2 to this subpart, you must comply with subpart SS of this part 63 as specified in §63.8000(c), except as specified in §63.8000(d) and paragraphs (b) through (d) of this section.

(b) *Exceptions to subparts SS and WW of this part 63.* (1) If you conduct a performance test or design evaluation for a control device used to control emissions only from storage tanks, you must establish operating limits, conduct monitoring, and keep records using the same procedures as required in subpart SS of this part 63 for control devices used to reduce emissions from process vents instead of the procedures specified in §§63.985(c), 63.998(d)(2)(i), and 63.999(b)(2).

(2) When the term storage vessel is used in subparts SS and WW of this part 63, the term storage tank, as defined in §63.8105 applies for the purposes of this subpart.

(c) *Planned routine maintenance.* The emission limits in Table 2 to this subpart for control devices used to control emissions from storage tanks do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of each control device, during which the control device does not meet the emission limit specified in Table 2 to this subpart, must not exceed 240 hours per year (hr/yr). You may submit an application to the Administrator requesting an extension of this time limit to a total of 360 hr/yr. The application must explain why the extension is needed, it must indicate that no material will be added to the storage tank between the time the 240 hr/yr limit is exceeded and the control device is again operational, and it must be submitted at least 60 days before the 240 hr/yr limit will be exceeded.

(d) *Vapor balancing alternative.* As an alternative to the emission limits specified in Table 2 to this subpart, you may elect to implement vapor balancing in accordance with §63.1253(f), except as specified in paragraphs (d)(1) and (2) of this section.

(1) To comply with §63.1253(f)(6)(i), the owner or operator of an offsite cleaning and reloading facility must comply with §§63.7995 through 63.8105 instead of complying with §63.1253(f)(7)(ii).

(2) You may elect to set a pressure relief device to a value less than the 2.5 psig required in §63.1253(f)(5) if you provide rationale in your notification of compliance status report explaining why the alternative value is sufficient to prevent breathing losses at all times.

§ 63.8015 What requirements apply to my equipment leaks?

(a) You must meet each requirement in Table 3 to this subpart that applies to your equipment leaks, except as specified in paragraphs (b) through (d) of this section.

(d) For the purposes of this subpart, pressure testing for leaks in accordance with §63.1036(b) is not required after reconfiguration of an equipment train if flexible hose connections are the only disturbed equipment.

§ 63.8050 How do I comply with emissions averaging for stationary process vessels at existing sources?

(a) As an alternative to complying with the requirements in Table 1 to this subpart for each individual stationary process vessel, you may elect to comply with emissions averaging for stationary process vessels greater than or equal to 250 gallons (gal) at your existing affected source as specified in paragraphs (b) through (e) of this section.

(b) *General requirements.* (1) A State may prohibit averaging of HAP emissions and require the owner or operator of an existing affected source to comply with the emission limits and work practice standards in Table 1 to this subpart.

(2) All stationary process vessels in an emissions averaging group must be equipped with a tightly-fitting vented cover.

(c) *Initial compliance.* To demonstrate initial compliance with the emissions averaging alternative, you must comply with the provisions in paragraphs (c)(1) through (4) of this section.

(1) Estimate uncontrolled emissions from each affected stationary process vessel in pounds per batch using the procedures specified in §63.1257(d)(2), except as specified in paragraphs (c)(1)(i) and (ii) of this section. For the purposes of this section, uncontrolled emissions means the emissions from the vessel if it were equipped only with a tightly-fitting vented cover. You must identify the range of typical operating parameters and perform the calculation using the values that result in the highest emissions, and you must document the operating parameters and resulting emissions calculations in the precompliance report.

(i) When you are required to calculate uncontrolled emissions from heating, you may not calculate emissions using Equation 13 of subpart GGG of this part 63.

(ii) The statement in §63.1257(d)(2)(i)(B) that “the partial pressure of HAP shall be assumed to be 25 percent of the saturated value if the purge flow rate is greater than 100 scfm” does not apply. For the purposes of this subpart, multiply the HAP partial pressure in Equation 12 of 40 CFR part 63, subpart GGG by a HAP-specific saturation factor determined in accordance with Equations 1 through 3 of this section. Solve equation 1 of this section iteratively beginning with saturation factors (in the right-hand side of the equation) of 1.0 for each condensable compound. Stop iterating when the calculated saturation factors for all compounds are the same to two significant figures for subsequent iterations. Note that for multi-component emission streams, saturation factors must be calculated for all condensable compounds, not just the HAP.

$$S_i = \frac{K_i A}{K_i A + V + \sum_{i=1}^{n} S_i V_i^{sat}} \qquad Eq.\ 1 \qquad V_i^{sat} = \frac{VP_i}{\left(P_T - \sum_{i=1}^{n} P_i\right)} \qquad Eq.\ 2 \qquad K_i = K_o \left(\frac{M_o}{M_i}\right)^{1/3} \qquad Eq.\ 3$$

where:

S_1=saturation factor for individual condensable compounds in the emission stream

P_i=partial pressure of individual condensable compounds in the emission stream calculated using Raoult's Law or other appropriate methods

P_T=pressure of the vessel vapor space

A=surface area of liquid

V=purge flow rate as used in Equation 12 of 40 CFR part 63, subpart GGG

V_i^{sat} =volumetric flowrate of condensable compounds in the emission stream

K_i=mass transfer coefficient of individual condensable compounds in the emission stream

K_o=mass transfer coefficient of a reference compound (e.g., 0.83 cm/s for water)

M_o=molecular weight of reference compound (e.g., 18.02 for water)

M_i=molecular weight of individual condensable compounds in the emission stream

n=number of condensable compounds in the emission stream

(3) Determine actual emissions in pounds per batch for each vessel in accordance with paragraph (c)(3)(i), (ii), or (iii) of this section, as applicable.

(4) Provide rationale in the precompliance report for why the sum of the actual emissions will be less than the sum of emissions from the vessels if they had been controlled in accordance with Table 1 to this subpart. The approved actual emissions calculated according to paragraph (c)(3) of this section are emission limits that must be incorporated into your operating permit.

(d) *Continuous compliance.* (1) Maintain a monthly log of the number of batches produced that can be correlated with the emissions estimates per batch developed in accordance with paragraph (c) of this section.

(2) Sum the actual emissions for all of the process vessels in the emissions averaging group every three months, with the first 3-month period beginning on the compliance date, and compare the resulting total with the total emissions for the vessels calculated in accordance with paragraph (c)(2) of this section. Compliance is demonstrated if the sum of the actual emissions is less than the emissions estimated in accordance with paragraph (c)(2) of this section.

(e) *Recordkeeping and reporting.* Comply with §§63.8070, 63.8075, and 63.8080.

§ 63.8055 How do I comply with a weight percent HAP limit in coating products?

(a) As an alternative to complying with the requirements in Table 1 to this subpart for each individual stationary process vessel at an existing source, you may elect to comply with a 5 weight percent HAP limit for process vessels at your affected source that are used to manufacture coatings with a HAP content of less than 0.05 kg per kg product as specified in paragraph (b) of this section.

(b) You may only comply with the alternative during the production of coatings that contain less than 5 weight percent HAP, as determined using any of the procedures specified in paragraphs (b)(1) through (4) of this section.

(1) Method 311 (appendix A to 40 CFR part 63).

(2) Method 24 (appendix A to 40 CFR part 60). You may use Method 24 to determine the mass fraction of volatile matter and use that value as a substitute for the mass fraction of HAP.

(3) You may use an alternative test method for determining mass fraction of HAP if you obtain prior approval by the Administrator. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(4) You may rely on formulation data from raw material suppliers if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens, as specified in 29 CFR

1910.1200(d)(4), and at 1.0 percent by mass or more for other compounds. If the HAP weight percent estimated based on formulation data conflicts with the results of a test conducted according to paragraphs (b)(1) through (3) of this section, then there is a rebuttal presumption that the test results are accurate unless, after consultation, you demonstrate to the satisfaction of the permitting authority that the test results are not accurate and that the formulation data are more appropriate.

§ 63.8070 What notifications must I submit and when?

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

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

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

§ 63.8075 What reports must I submit and when?

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

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

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

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

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

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

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

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

(4) If you comply with emissions averaging in §63.8050, the data and results of emission calculations as specified in §63.8050(c)(1) through (3), and rationale for why the sum of actual emissions will be less than the sum of emissions if the process vessels were controlled in accordance with Table 1 to this subpart as specified in §63.8050(c)(4).

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

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

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

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

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

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

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

(v) Identify storage tanks for which you are complying with the vapor balancing alternative in §63.8010(e).

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

(1) Company name and address.

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

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

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

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

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

(ii) A description of each malfunction.

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

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

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

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

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

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

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

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

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

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

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

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

(C) A change in compliance status.

§ 63.8080 What records must I keep?

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

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

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

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

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

(f) In the SSMP required by §63.6(e)(3), you are not required to include Group 2 or non-affected emission points. For equipment leaks only, the SSMP requirement is limited to control devices and is optional for other equipment.

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

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

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

§ 63.8100 Who implements and enforces this subpart?

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

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

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

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

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

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

§ 63.8105 What definitions apply to this subpart?

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

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

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

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

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

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

(g) All other terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this paragraph (g). If a term is defined in §63.2, §63.981, §63.1001, §63.1020, §63.1061, or §63.1251 and in this paragraph (g), the definition in this paragraph (g) applies for the purposes of this subpart.

Bulk loading means the loading, into a tank truck or rail car, of liquid coating products that contain one or more of the organic HAP, as defined in section 112 of the CAA, from a loading rack. A loading rack is the system used to fill tank trucks and railcars at a single geographic site.

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

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

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

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

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

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

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

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

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

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

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

Group 1 transfer operations means all bulk loading of coating products if the coatings contain greater than or equal to 3.0 million gallons per year (gal/yr) of HAP with a weighted average HAP partial pressure greater than or equal to 1.5 psia.

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

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

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

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

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

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

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

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

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

(2) As obtained from standard reference texts; or

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

(4) Any other method approved by the Administrator.

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

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

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

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

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

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

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

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

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

Small control device means a control device that controls total HAP emissions of less than 10 tpy, before control.

Soluble HAP means the HAP listed in Table 8 of this subpart.

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

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

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

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

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

(4) Wastewater storage tanks; and

(5) Process vessels.

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

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

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

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

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

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

For each . . .	You must . . .	And you must . . .
2. Stationary process vessel at an existing source.	b. Equip the vessel with a tightly fitting vented cover or lid that must be closed at all times when the vessel contains HAP, except for material additions and sampling.	iii. Reduce emissions of total organic HAP by venting emissions through a closed-vent system to a condenser that reduces the outlet gas temperature to: <2 °C if the process vessel contains HAP with a partial pressure >=0.6 kPa and <17.2 kPa,

Table 2 to Subpart HHHHH of Part 63—Emission Limits for Storage Tanks

As required in §63.8010, you must meet each emission limit in the following table that applies to your storage tanks.

For each . . .	Then you must . . .
1. Group 1a storage tank.....	a. Comply with the requirements of subpart WW of this part, except as specified in § 63.8010(b); or

	b. Reduce total organic HAP emissions from the storage tank by >=90 percent by weight by venting emissions through a closed-vent system to any combination of control devices (excluding a flare); or c. Reduce total organic HAP emissions from the storage tank by venting emissions from a non-halogenated vent stream through a closed-vent system to a flare.

Table 3 to Subpart HHHHH of Part 63—Requirements for Equipment Leaks

As required in §63.8015, you must meet each requirement in the following table that applies to your equipment leaks.

For all . . .	You must . . .
1. Equipment that is in organic HAP service at an existing source.	a. Comply with the requirements in §§ 63.424(a) through (d) and 63.428(e), (f), and (h)(4), except as specified in § 63.8015(b); or b. Comply with the requirements of subpart TT of this part; or c. Comply with the requirements of subpart UU of this part, except as specified in § 63.8015(c) and (d).

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

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

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

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

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

Citation	Subject	Explanation
§ 63.1	Applicability	Yes.
§ 63.2	Definitions	Yes.
§ 63.3	Units and Abbreviations	Yes.
§ 63.4	Prohibited Activities	Yes.
§ 63.5	Construction/Reconstruction	Yes.
§ 63.6(a)	Applicability	Yes.
§ 63.6(b)(1)-(4)	Compliance Dates for New and Reconstructed sources.	Yes.
§ 63.6(b)(5)	Notification	Yes.
§ 63.6(c)(1)-(2)	Compliance Dates for Existing Sources.	Yes.
§ 63.6(e)(1)-(2)	Operation & Maintenance	Yes.
§ 63.6(e)(3)(i), (ii), and (v)	SSMP	Yes, except information regarding Group 2 through (viii). emission points and equipment leaks is not required in the SSMP, as specified in § 63.8080(f).
§ 63.6(e)(3)(iii) and (iv)	Recordkeeping and Reporting	No, §§ 63.998(d)(3) and During Startup, Shutdown, 63.998(c)(1)(ii)(D) through (G) Specify and Malfunction (SSM). the recordkeeping requirement for SSM events, and § 63.8075(e)(5) specifies reporting requirements.
§ 63.6(e)(3)(ix)	Title V permit	Yes.
§ 63.6(f)(1)	Compliance Except During SSM.	Yes.
§ 63.6(f)(2)-(3)	Methods for Determining Compliance.	Yes.
§ 63.6(g)(1)-(3)	Alternative Standard	Yes.
§ 63.6(i)(1)-(14)	Compliance Extension	Yes.
§ 63.6(j)	Presidential Compliance Exemption.	Yes.
§ 63.7(a)(1)-(2)	Performance Test Dates	Yes, except substitute 150 days for 180 days.
§ 63.7(b)(1)	Notification of Performance Test.	Yes.
§ 63.7(b)(2)	Notification of Rescheduling.	Yes.
§ 63.7(d)	Testing Facilities	Yes.
§ 63.7(e)(1)	Conditions for Conducting Performance Tests.	Yes, except that performance tests for process vessels must be conducted under worst-case conditions as specified in § 63.8005.
§ 63.7(e)(2)	Conditions for Conducting Performance Tests.	Yes.
§ 63.7(e)(3)	Test Run Duration	Yes.
§ 63.7(f)	Alternative Test Method	Yes.
§ 63.7(g)	Performance Test Data Analysis.	Yes.
§ 63.7(h)	Waiver of Tests	Yes.
§ 63.8(a)(1)	Applicability of Monitoring Requirements.	Yes.

§ 63.8(a)(2).....	Performance Specifications.	Yes.
§ 63.8(b)(1).....	Monitoring.....	Yes.
§ 63.8(c)(1).....	Monitoring System Operation and Maintenance.	Yes.
§ 63.8(c)(1)(i).....	Maintain and operate CMS...	Yes.
§ 63.8(c)(1)(ii).....	Routine repairs.....	Yes.
§ 63.8(c)(2)-(3).....	Monitoring System Installation.	Yes.
§ 63.8(f)(1)-(5).....	Alternative Monitoring Method.	Yes, except you may also request approval using the precompliance report.
§ 63.9(a).....	Notification Requirements..	Yes.
§ 63.9(b)(1)-(5).....	Initial Notifications.....	Yes.
§ 63.9(c).....	Request for Compliance Extension.	Yes.
§ 63.9(e).....	Notification of Performance Test.	Yes.
§ 63.9(f).....	Notification of VE/Opacity Test.	No. This subpart does not contain opacity or VE limits.
§ 63.9(h)(1)-(6).....	Notification of Compliance Status.	Yes, except this subpart has no opacity or VE limits, and § 63.9(h)(2) does not apply because § 63.8075(d) specifies the required contents and due date of the notification of compliance status report.
§ 63.9(i).....	Adjustment of Submittal Deadlines.	Yes.
§ 63.9(j).....	Change in Previous Information.	No, § 63.8075(e)(8) specifies reporting requirements for process changes.
§ 63.10(a).....	Recordkeeping/Reporting....	Yes.
§ 63.10(b)(1).....	Recordkeeping/Reporting....	Yes.
§ 63.10(b)(2)(i)-(iv).....	Records related to SSM.....	No, §§ 63.998(d)(3) and 63.998(c)(1)(ii)(D) through (G) specify recordkeeping requirements for periods of SSM.
§ 63.10(b)(2)(vii)-(ix).....	Records.....	Yes.
§ 63.10(b)(2)(xii).....	Records.....	Yes.
§ 63.10(b)(2)(xiii).....	Records.....	Yes.
§ 63.10(b)(2)(xiv).....	Records.....	Yes.
§ 63.10(b)(3).....	Records.....	Yes.
§ 63.10(c)(7)-(8).....	Records.....	No. Recordkeeping requirements are specified in § 63.8080.
§ 63.10(d)(1).....	General Reporting Requirements.	Yes.
§ 63.10(d)(2).....	Report of Performance Test Results.	Yes.
§ 63.10(d)(3).....	Reporting Opacity or VE Observations.	No. This subpart does not contain opacity or VE limits.
§ 63.10(d)(4).....	Progress Reports.....	Yes.
§ 63.10(d)(5)(i).....	SSM Reports.....	No, § 63.8075(e)(5) and (6) specify the SSM reporting requirements.
§ 63.10(d)(5)(ii).....	Immediate SSM reports.....	No.
§ 63.10(e)(3).....	Reports.....	No. Reporting requirements are specified in § 63.8075.

§ 63.10(e)(3)(i)-(iii).....	Reports.....	No. Reporting requirements are specified in § 63.8075.
§ 63.10(e)(3)(iv)-(v).....	Excess Emissions Reports...	No. Reporting requirements are specified in § 63.8075.
§ 63.10(e)(3)(vi-viii).....	Excess Emissions Report and Summary Report.	No. Reporting requirements are specified in § 63.8075.
§ 63.10(f).....	Waiver for Recordkeeping/ Reporting.	Yes.
§ 63.12.....	Delegation.....	Yes.
§ 63.13.....	Addresses.....	Yes.
§ 63.14.....	Incorporation by Reference.	Yes.
§ 63.15.....	Availability of Information	Yes.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Royal Adhesives & Sealants, LLC
Source Address: 2001 West Washington Street, South Bend, IN 46628
Mailing Address: 2001 West Washington Street, South Bend, IN 46628
Part 70 Permit No.: T141-19496-00146

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	Royal Adhesives & Sealants, LLC
Source Address:	2001 West Washington Street, South Bend, IN 46628
Mailing Address:	2001 West Washington Street, South Bend, IN 46628
Part 70 Permit No.:	T141-19496-00146

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

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

X The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and

X The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Royal Adhesives & Sealants, LLC
Source Address: 2001 West Washington Street, South Bend, IN 46628
Mailing Address: 2001 West Washington Street, South Bend, IN 46628
Part 70 Permit No.: T141-19496-00146
Facility: Five and three gallon adhesive canning line
Parameter: VOC input
Limit: VOC input to the five and three gallon adhesive canning process shall be limited to less than 19,111 tons per 12 consecutive month period, with compliance determined at the end of each month.

YEAR:

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Royal Adhesives & Sealants, LLC
Source Address: 2001 West Washington Street, South Bend, IN 46628
Mailing Address: 2001 West Washington Street, South Bend, IN 46628
Part 70 Permit No.: T141-19496-00146

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of 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 "No deviations occurred this reporting period".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

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

Source Name:	Royal Adhesives and Sealants, L.L.C.
Source Location:	2001 West Washington Street, South Bend, IN 46628
County:	St. Joseph
SIC Code:	2891
Operation Permit No.:	T141-19496-00146
Permit Reviewer:	Tanya White/EVP

On September 29, 2006, the Office of Air Quality (OAQ) had a notice published in the *South Bend Tribune*, South Bend, Indiana, stating that Royal Adhesives and Sealants, L.L.C. had applied for a Part 70 Operating Permit Renewal to continue to operate a sealant and adhesive production plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 26, Royal Adhesives and Sealants, L.L.C. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows:

Comment 1
In Section D.1 Churn CH-27 is identified as a sealant churn and it should be included as an adhesive churn. Please correct this as required in the facility description and related permit conditions.

Response 1
IDEM agrees with the change requested by the source and the permit is being revised as follows (additions in bold, deletions in ~~strikeout~~):

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

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

(a) The following adhesive and sealant churns, each containing a nitrogen blanket purging system which is integral to the churning process, each exhausting to its respective vent and equipped with its respective condenser for VOC control. These emissions units are affected units under 40 CFR 63, Subpart HHHHH:

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Sealant CH-7	S-7	CE-7	November 1996	210
Sealant CH-8	S-8	CE-8	November 1996	210
Sealant CH-9	S-9	CE-9	June 1998	900
Sealant CH-10	S-10	CE-10	June 1998	900
~~Sealant CH-27~~	~~S-27~~	~~CE-27~~	~~March 2001~~	~~1,522~~
Sealant CH-28	S-28	CE-28	April 2003	500
Sealant CH-53	S-53	CE-53	November 1996	500

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Adhesive CH-1	S-1	CE-1	November 1996	330
Adhesive CH-2	S-2	CE-2	November 1996	330
Adhesive CH-3	N/A	N/A	November 1996	55
Adhesive CH-22	S-22	CE-22	June 1998	2,000
Adhesive CH-25	S-25	CE-25	April 1999	750
Adhesive CH-26	S-26	CE-26	November 1996	1,500
Adhesive CH-27	**S-27**	**CE-27**	**March 2001**	**1,522**
Adhesive CH-29	S-29	CE-29	May 2005	3,000
Adhesive CH-54	S-54	CE-54	November 1996	550
Adhesive CH-55	S-55	CE-55	November 1996	560
Adhesive CH-56	S-56	CE-56	November 1996	600

The sealant churns above have a combined maximum production capacity of ~~2,489~~**1,230** lbs/hr, and the adhesive churns have a combined maximum production capacity of ~~7,945~~**9,203** lbs/hr. The source will utilize a cartridge type dust collector, identified as DC-3, with 18 cartridges to control PM emissions from sealant churns CH-7, CH-8, and adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-54, CH-55, and CH-56. The dust collector flowrate is 12,000 cubic feet per minute (cfm).

…

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) The following adhesive and sealant churns, each containing a nitrogen blanket purging system which is integral to the churning process, each exhausting to its respective vent and equipped with its respective condenser for VOC control. These emissions units are affected units under 40 CFR 63, Subpart HHHHH:

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Sealant CH-7	S-7	CE-7	November 96	210
Sealant CH-8	S-8	CE-8	November 96	210
Sealant CH-9	S-9	CE-9	June 98	900
Sealant CH-10	S-10	CE-10	June 98	900
~~Sealant CH-27~~	~~S-27~~	~~CE-27~~	~~March 2001~~	~~1,522~~
Sealant CH-28	S-28	CE-28	April 03	500
Sealant CH-53	S-53	CE-53	November 96	500
Adhesive CH-1	S-1	CE-1	November 96	330
Adhesive CH-2	S-2	CE-2	November 96	330
Adhesive CH-3	N/A	N/A	November 96	55
Adhesive CH-22	S-22	CE-22	June 98	2,000
Adhesive CH-25	S-25	CE-25	April 99	750
Adhesive CH-26	S-26	CE-26	November 96	1,500
Adhesive CH-27	**S-27**	**CE-27**	**March 2001**	**1,522**
Adhesive CH-29	S-29	CE-29	May 2005	3,000
Adhesive CH-54	S-54	CE-54	November 96	550
Adhesive CH-55	S-55	CE-55	November 96	560
Adhesive CH-56	S-56	CE-56	November 96	600

The sealant churns above have a combined maximum production capacity of ~~2,489~~**1,230** lbs/hr, and the adhesive churns have a combined maximum production capacity of ~~7,945~~**9,203** lbs/hr. The source will utilize a cartridge type dust collector, identified as DC-3, with 18 cartridges to control PM emissions from sealant churns CH-7, CH-8, and adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-54, CH-55, and CH-56. The dust collector flowrate is 12,000 cubic feet per minute (cfm).

…

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

D.1.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

(a) The total time of nitrogen purging for each batch is limited to 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, ~~CH-27,~~ CH-28 and CH-53, 10 minutes/batch for adhesive churns CH-1, CH-2 and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55 and CH-56, and 45 minutes/batch for adhesive ~~churn~~**churns** CH-29 **and CH-27**. The maximum number of batches per day is limited to 1 batch per day for sealant churns CH-7, CH-8, CH-9, CH-10, ~~CH-27,~~ CH-28 and CH-53 and adhesive churns CH-1, CH-2, CH-22, **CH-27,** CH-29 and CH-54, 2 batches per day for adhesive churn 3 and 6 batches per day for adhesive churns CH-25, CH-26, CH-55 and CH-56.

The maximum amount of time for batch purging shall be limited to 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, ~~CH-27,~~ CH-28 and CH-53, 10 minutes/batch for adhesive churns CH-1, CH-2 and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55 and CH-56, and 45 minutes/batch for adhesive ~~churn~~**churns** CH-29 **and CH-27**. The maximum number of batches per day shall be limited to 1 batch per day for sealant churns CH-7, CH-8, CH-9, CH-10, ~~CH-27,~~ CH-28 and CH-53 and adhesive churns CH-1, CH-2, CH-22, **CH-27,** CH-29 and CH-54, 2 batches per day for adhesive churn 3 and 6 batches per day for adhesive churns CH-25, CH-26, CH-55 and CH-56.

(b) VOC input to the five and three gallon adhesive canning process shall be limited to less than 19,111 tons of VOC per 12 consecutive month period. This VOC input limitation will limit VOC emissions from the five and three gallon adhesive canning line to less than 25 tons per 12 consecutive month period.

Compliance with these limits renders 326 IAC 8-1-6 (BACT) not applicable.

…

D.1.5 Solvent-based Churns

Adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-26, **CH-27,** CH-29, CH-54, CH-55, CH-56, and solvent-based sealant churns CH-9, CH-10, CH-7, CH-8, ~~CH-27,~~ CH-28, CH-53, each of which contain a nitrogen blanket purging system which is integral to the mixing process, have applicable compliance monitoring conditions as specified below:

(a) Once each calendar year, the source shall observe and record the number of minutes during an entire cycle of mixing that each adhesive churn and each sealant churn purges when mixing a worst-case formula for that churn.

(b) Such records shall include identification of the churn, identification of formula, batch size, total number of hours churned, and total number of minutes that purging occurred. Such records shall remain on site for 5 years.

These monitoring conditions are necessary to ensure that maximum total minutes for batch purging shall remain no greater than 10 minutes/batch for adhesive churns CH-1, CH-2, and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55, and CH-56, 45 minutes/batch for adhesive ~~churn~~**churns** CH-29 **and CH-27**, and 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, ~~CH-27,~~ CH-28, and CH-53, so that potential VOC emission will remain less than 25 tons/year and 326 IAC 8-1-6 (BACT) will not apply.

…

SECTION D.3 EMISSIONS UNITS OPERATION CONDITIONS

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

(a) The following adhesive and sealant churns, each containing a nitrogen blanket purging system which is integral to the churning process, each exhausting to its respective vent and equipped with its respective condenser for VOC control. These emissions units are affected units under 40 CFR 63, Subpart HHHHH:

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Sealant CH-9	S-9	CE-9	June 98	900
Sealant CH-10	S-10	CE-10	June 98	900
~~Sealant CH-27~~	~~S-27~~	~~CE-27~~	~~March 2001~~	~~1,522~~
Sealant CH-28	S-28	CE-28	April 03	500
Sealant CH-53	S-53	CE-53	November 96	500
Adhesive CH-1	S-1	CE-1	November 96	330
Adhesive CH-2	S-2	CE-2	November 96	330
Adhesive CH-22	S-22	CE-22	June 98	2,000
Adhesive CH-25	S-25	CE-25	April 99	750
Adhesive CH-26	S-26	CE-26	November 96	1,500
Adhesive CH-27	**S-27**	**CE-27**	**March 2001**	**1,522**
Adhesive CH-29	S-29	CE-29	May 2005	3,000
Adhesive CH-54	S-54	CE-54	November 96	550
Adhesive CH-55	S-55	CE-55	November 96	560
Adhesive CH-56	S-56	CE-56	November 96	600

…

Comment 2
Condition D.1.2 establishes an Emission Offset minor limit, by limiting the emissions of VOCs from the sealant and adhesives churns to less than 42.07 tons per 12 consecutive month total. The source is requesting that this limit be removed from the permit and the source be considered a major source under 326 IAC 2-3, Emission Offset Rules. The source will be a minor source upon the re-designation of St. Joseph County to attainment, as the potential emissions will be below the 250 tons per year limit. In addition to removing the Emission Offset Minor Limit the source requests that the Testing Requirements of D.1.3 also be removed from the permit as they are not required if the source is considered a major source. The source is electing to become a major source so they do not have to undergo the required stack testing and related costs associated with this testing that will be required to demonstrate compliance with the Emissions Offset Minor Limit. There are no major modifications on the horizon that would trigger major Emission Offset review.

Response 2
IDEM disagrees with the comment that testing will not be required if the Emission Offset minor limit is removed from the permit. Testing for the adhesive and sealants churns is necessary to establish emission factors for the churns because testing has not been performed on these facilities in the past. The emission calculations currently indicate that each churn has limited potential emissions of VOCs that are less than 25 tons per year and therefore each churn is not subject to the requirements of 326 IAC 8-1-6 (BACT). The stack testing will establish emission factors for the churns so that the source will be able to verify that each churn does not have emissions over 25 tons per year. As such, the testing requirements will remain in the permit.

In reference to the comment made on the Emission Offset minor limit, IDEM has determined that this limit is not required; therefore the limit has been removed from the permit. Removal of the Emission Offset minor limit does not trigger applicability of any other regulations because the Emission Offset minor limit was not established in any previous air approvals for this source. The following paragraph discusses why the limit is not required:

Prior to June 15, 2004, St. Joseph County was designated as attainment for ozone because the potential emissions of VOC and NOx were each less than 250 tons per year. On June 15, 2004, St. Joseph County was designated as a basic nonattainment area for the 8-hour ozone standard. The major source threshold for a basic nonattainment area under Emission Offset is 100 tons per year each of VOC and NOx. On June 15, 2004 potential emissions of VOC at this source were greater than 100 tons per year. As such, this source became a major source under 326 IAC 2-3 (Emission Offset). Under Administrative Amendments No.: 141-17361-00146 and No. 141-21201-00146 and Significant Permit Modification No. 141-21816-00146, the source added equipment or modified operating rates that subsequently increased VOC emissions; however these modifications to the source were considered minor modifications because the increases in emissions from each modification were below Emission Offset significant thresholds; therefore these modification are not required to go through Emission Offset major source modification review. The Source Status in the permit has been revised to indicate that this source is a major source under Emission Offset.

The following changes have been made to the permit (additions in bold, deletions in ~~strikeout~~). The Table of Contents has been modified to reflect these changes:

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary sealant and adhesive manufacturing plant.

Responsible Official:	Vice President of Operations
Source Address:	2001 West Washington Street, South Bend, IN 46628
Mailing Address:	2001 West Washington Street, South Bend, IN 46628
General Source Phone Number:	(574) 246-5000
SIC Code:	2891
County Location:	St. Joseph
Source Location Status:	~~Moderate~~**Basic** nonattainment for 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD ~~and Emission Offset Rules~~ **Major Source, under Emission Offset Rules** Major Source, Section 112 of the Clean Air Act

~~D.1.2 Emission Offset Minor Limit [326 IAC 2-3]~~

~~The emissions of VOCs, including coatings, dilution solvents, and cleaning solvents for the sealant churns (CH-7, CH-8, CH-9, CH-10, CH-27, CH-28 and CH-53) and adhesive churns (CH-1, CH-2, CH-3, CH-22, CH-25, CH-26, CH-29, CH-54, CH-55, and CH-56), shall be limited such that the combined VOC emissions are less than 42.07 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This emission limitation is required to limit the source wide potential to emit of VOCs to less than 100 tons per 12 consecutive month period. Compliance with this limit will render 326 IAC 2-3 (Emission Offsets) not applicable.~~

~~Compliance with the VOC emission limit shall be determined by the following equation:~~

$$A = [(\sum_{i=1}^{17} (B_i * C_i * D_i)) / 60 / 2000]$$

~~Where~~

~~A = VOC emissions in tons per month~~
~~B_i = Purge times per batch~~
~~C_i = Emission factors (pounds of VOC/hour of purging) established in the latest stack test~~
~~D_i = Number of batches per month~~

~~Churn ID:~~	~~Purge Times (B) (minutes)~~	~~Emission Factor (lbs of VOC/hour of purging)~~
~~CH-1~~	~~B_1 = 10~~	~~C_1 = 61.65~~
~~CH-2~~	~~B_2 =10~~	~~C_2 = 61.65~~
~~CH-3~~	~~B_3 = 5~~	~~C_3 = 61.65~~
~~CH-7~~	~~B_4 = 45~~	~~C_4 = 13.93~~
~~CH-8~~	~~B_5 = 45~~	~~C_5 = 13.93~~
~~CH-9~~	~~B_6 = 45~~	~~C_6 = 13.93~~
~~CH-10~~	~~B_7 = 45~~	~~C_7 = 13.93~~
~~CH-22~~	~~B_8 = 55~~	~~C_8 = 61.65~~
~~CH-25~~	~~B_9 = 9.5~~	~~C_9 = 61.65~~
~~CH-26~~	~~B_{10} = 9.5~~	~~C_{10} = 61.65~~
~~CH-27~~	~~B_{11} = 45~~	~~C_{11} = 13.93~~
~~CH-28~~	~~B_{12} = 45~~	~~C_{12} = 13.93~~
~~CH-29~~	~~B_{13} = 45~~	~~C_{13} = 61.65~~
~~CH-53~~	~~B_{14} = 45~~	~~C_{14} = 13.93~~
~~CH-54~~	~~B_{15} = 10~~	~~C_{15} = 61.65~~
~~CH-55~~	~~B_{16} = 9.5~~	~~C_{16} = 61.65~~
~~CH-56~~	~~B_{17} = 9.5~~	~~C_{17} = 61.65~~

~~Until testing is performed for the sealant and adhesive churns, the emission factors included above shall be used. Upon completion of the stack test for sealant churns (CH-7, CH-8, CH-9, CH-10, CH-27, CH-28 and CH-53) and adhesive churns (CH-1, CH-2, CH-3, CH-22, CH-25, CH-26, CH-29, CH-54, CH-55, and CH-56), the source shall use the emission factors established in the most recent stack test to calculate the allowable VOC usage for the adhesive and sealant churns.~~

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

~~D.1.3~~**D.1.2** Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within 180 days after issuance of this permit, in order to demonstrate compliance with ~~Conditions~~**Condition** D.1.1(a)~~ and D.1.2~~, the Permittee shall perform VOC testing for the adhesive and sealant churns to verify emission factors, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

~~D.1.4~~**D.1.3** Volatile Organic Compound (VOC) Control

In order to comply with Condition D.1.1, the nitrogen purging systems, which are integral to the process and provide enclosure during the churning process, except during intermittent periods of nitrogen purging, and the condensers for the solvent churns shall be in operation and control emissions from the solvent-based production processes at all times the solvent-based production processes are in operation.

~~D.1.5~~**D.1.4** Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in ~~Conditions~~**Condition** D.1.1(b)~~ 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", or Material Safety Data Sheets (MSDS), and "as applied" VOC 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.

~~D.1.6~~**D.1.5** Solvent-based Churns

Adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-26, CH-29, CH-54, CH-55, CH-56, and solvent-based sealant churns CH-9, CH-10, CH-7, CH-8, CH-27, CH-28, CH-53, each of which contain a nitrogen blanket purging system which is integral to the mixing process, have applicable compliance monitoring conditions as specified below:

(a) Once each calendar year, the source shall observe and record the number of minutes during an entire cycle of mixing that each adhesive churn and each sealant churn purges when mixing a worst-case formula for that churn.

(b) Such records shall include identification of the churn, identification of formula, batch size, total number of hours churned, and total number of minutes that purging occurred. Such records shall remain on site for 5 years.

These monitoring conditions are necessary to ensure that maximum total minutes for batch purging shall remain no greater than 10 minutes/batch for adhesive churns CH-1, CH-2, and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55, and CH-56, 45 minutes/batch for adhesive churn CH-29, and 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, CH-27, CH-28, and CH-53, so that potential VOC emission will remain less than 25 tons/year and 326 IAC 8-1-6 (BACT) will not apply.

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

~~D.1.7~~**D.1.6** Record Keeping Requirements

(a) To document compliance with Condition D.1.1(b), the Permittee shall record the VOC input to the five and three gallon adhesive canning process. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established for the five and three gallon adhesive canning process in Condition D.1.1(b).

(b) To document compliance with ~~Conditions~~**Condition** D.1.1(a)~~ and D.1.2~~, the Permittee shall maintain the following records. Records shall be complete and sufficient to establish compliance with the VOC emission limits established for each of the adhesive and sealant churns in ~~Conditions~~**Condition** D.1.1(a)~~ and D.1.2~~.

(1) The purging time per batch and the number of batches per day for each churn;

(2) The number of batches per month for each churn; and

(3) Total VOC emissions per month for each churn.

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

~~D.1.8~~**D.1.7** Reporting Requirements

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

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

~~Part 70 Quarterly Report~~

~~Source Name: Royal Adhesives & Sealants, LLC~~

~~Source Address: 2001 West Washington Street, South Bend, IN 46628~~

~~Mailing Address: 2001 West Washington Street, South Bend, IN 46628~~
~~Part 70 Permit No.: T141-19496-00146~~
~~Facility: Sealant churns CH-7, CH-8, CH-9, CH-10, CH-28, CH-53, and adhesive churns CH-1, CH-2, CH-3, CH-22, Ch-25, CH-26, CH-29, CH-54, CH-55, and CH-56.~~
~~Parameter: VOC emissions~~
~~Limit: VOC emissions are limited by Condition D.1.2 of the permit, to 42.07 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~

~~YEAR:~~

~~Month~~	~~Column 1~~	~~Column 2~~	~~Column 1 + Column 2~~
	~~VOC Emissions Month~~	~~VOC Emissions Previous 11 Months~~	~~VOC Emissions 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.~~

Comment 3
Royal Adhesives and Sealants does not want to take limitations on VOC usage to become a minor source under 326 IAC 2-3 (Emission Offset). Please revise the Technical Support Document to remove any references to Emission Offset limitations.

Response 3
Changes to the Technical Support Document that occur after the public notice period are documented in the Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and are part of the record regarding the permit decision. All references to the Emission Offset minor limitation in the Technical Support Document have been revised as documented in this addendum. (Refer to Response 2 for a detailed explanation regarding the removal of the Emission Offset minor limit from the permit.)

Potential to Emit of the Source

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

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

	Potential to Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Solvent Based Churns	8.42	8.42	--	<93.54**	--	--	Worst Case Single 10.69 Combined 80.23
Storage Tanks, Tube Fillers, Drum and Canning Lines, and Water Based Adhesive Churns	--	--	--	<57.53*	--	--	Worst Case Single 8.94 Combined 57.53
Natural Gas Combustion	0.14	0.56	0.04	0.40	6.16	7.33	Worst Case Single 0.13 Combined 0.14
Total PTE	8.56	8.98	0.04	<151.48	6.16	7.33	Worst Case Single >10 Combined >25

*Based on the limited PTE of VOCs from the five and three gallon adhesive canning lines as well as the PTE of VOCs from storage tanks, adhesive drums, the one gallon canning line, and other facilities.
**Based on limited nitrogen purge times and batch numbers in order to render 326 IAC 8-1-6 (BACT) not applicable.

(a) The potential to emit of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7;

…

County Attainment Status

The source is located in St. Joseph County

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as basic nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

…

OAQ Changes

Upon further review IDEM, OAQ has made the following changes to permit Condition D.1.1. The nitrogen purging and batch purging referenced in this condition are the same process, and has been inadvertently duplicated in the permit. The permit has been revised as follows (additions in bold, deletions in ~~strikeout~~):

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

D.1.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

(a) The total time of nitrogen purging for each batch is limited to 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, CH-28 and CH-53, 10 minutes/batch for adhesive churns CH-1, CH-2 and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55 and CH-56, and 45 minutes/batch for adhesive churns CH-29 and CH-27. The maximum number of batches per day is limited to 1 batch per day for sealant churns CH-7, CH-8, CH-9, CH-10, CH-28 and CH-53 and adhesive churns CH-1, CH-2, CH-22, CH-27, CH-29 and CH-54, 2 batches per day for adhesive churn 3 and 6 batches per day for adhesive churns CH-25, CH-26, CH-55 and CH-56.

~~The maximum amount of time for batch purging shall be limited to 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, CH-28 and CH-53, 10 minutes/batch for adhesive churns CH-1, CH-2 and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55 and CH-56, and 45 minutes/batch for adhesive churns CH-29 and CH-27. The maximum number of batches per day shall be limited to 1 batch per day for sealant churns CH-7, CH-8, CH-9, CH-10, CH-28 and CH-53 and adhesive churns CH-1, CH-2, CH-22, CH-27, CH-29 and CH-54, 2 batches per day for adhesive churn 3 and 6 batches per day for adhesive churns CH-25, CH-26, CH-55 and CH-56.~~

(b) VOC input to the five and three gallon adhesive canning process shall be limited to less than 19,111 tons of VOC per 12 consecutive month period. This VOC input limitation will limit VOC emissions from the five and three gallon adhesive canning line to less than 25 tons per 12 consecutive month period.

Compliance with these limits renders 326 IAC 8-1-6 (BACT) not applicable.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Royal Adhesives and Sealants, L.L.C.**
Source Location:	**2001 West Washington Street, South Bend, IN 46628**
County:	**St. Joseph**
SIC Code:	**2891**
Operation Permit No.:	**T141-9909-00146**
Operation Permit Issuance Date:	**March 16, 2000**
Permit Renewal No.:	**T141-19496-00146**
Permit Reviewer:	**Tanya White/EVP**

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Royal Adhesives and Sealants, L.L.C. (formerly known as Uniroyal Technology Corporation) relating to the operation of a sealant and adhesive production plant.

Permitted Emission Units and Pollution Control Equipment

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

(a) The following adhesive and sealant churns, each containing a nitrogen blanket purging system which is integral to the churning process, each exhausting to its respective vent and equipped with its respective condenser for VOC control. These emissions units are affected units under 40 CFR 63, Subpart HHHHH:

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Sealant CH-7	S-7	CE-7	November 1996	210
Sealant CH-8	S-8	CE-8	November 1996	210
Sealant CH-9	S-9	CE-9	June 1998	900
Sealant CH-10	S-10	CE-10	June 1998	900
Sealant CH-27*	S-27	CE-27	March 2001	1,522
Sealant CH-28	S-28	CE-28	April 2003	500
Sealant CH-53	S-53	CE-53	November 1996	500

* Churn CH-27 was an adhesive churn but is being converted to a sealant churn. There are no increases in the potential to emit and no changes in permit conditions as a result of this change.

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Adhesive CH-1	S-1	CE-1	November 1996	330
Adhesive CH-2	S-2	CE-2	November 1996	330
Adhesive CH-3	N/A	N/A	November 1996	55
Adhesive CH-22	S-22	CE-22	June 1998	2,000
Adhesive CH-25	S-25	CE-25	April 1999	750
Adhesive CH-26	S-26	CE-26	November 1996	1,500
Adhesive CH-29	S-29	CE-29	May 2005	3,000
Adhesive CH-54	S-54	CE-54	November 1996	550
Adhesive CH-55	S-55	CE-55	November 1996	560
Adhesive CH-56	S-56	CE-56	November 1996	600

The sealant churns above have a combined maximum production capacity of 2,489 lbs/hr, and the adhesive churns have a combined maximum production capacity of 7,945 lbs/hr. The source will utilize a cartridge type dust collector, identified as DC-3, with 18 cartridges to control PM emissions from sealant churns CH-7, CH-8, and adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-54, CH-55, and CH-56. The dust collector flowrate is 12,000 cubic feet per minute (cfm).

The following emission units (items (b) – (h)) are subject to the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing Requirements [40 CFR Part 63, Subpart HHHHH]:

(b) A five and three gallon adhesive canning line, with a maximum production of 8,291 lb/hr, with no VOC control, constructed in April 1997;

(c) A one gallon adhesive canning line, with a maximum production of 3,238 lb/hr, with no VOC control, constructed in April 1997;

(d) Two (2) tube filling systems: a double-head system, and a high-speed-single-head system. These systems have a combined maximum production capacity of 3,627 lbs/hr, with no VOC control;

(e) A VOL storage tank, identified as ST-11, with a volume of less than 40 cubic meters but greater than 1,000 gallons, erected in 1987 but not yet constructed/used, with pressure venting to the atmosphere and no emission control;

(f) Two (2) Volatile Organic Liquid (VOL) storage tanks, identified as ST-1 and ST-4, each with a volume of 95 cubic meters and a vapor pressure less than 15.0 kiloPascals, constructed in 1986, with pressure venting to the atmosphere and no emission control;

(g) Six (6) VOL storage tanks, identified as ST-2, ST-3, ST-5, ST-6, ST-7 and ST-8, each with a volume of 57 cubic meters, constructed in 1986, with pressure venting to the atmosphere and no emission control;

(h) Two (2) VOL storage tanks, identified as ST-9 and ST-10, each with a volume of less than 40 cubic meters but greater than 1,000 gallons, constructed in 1987, with pressure venting to the atmosphere and no emission control;

(i) Three (3) baghouse dust collectors, identified as DC-1, DC-2, and DC-3, controlling particulate emissions from all facilities except for VOL storage tanks ST-1 through ST-11.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

(a) Two (2) natural gas fired boilers, each installed in February 1997, and identified as B-1 and B-2, each rated at 1.68 million British Thermal Units per hour (MMBtu/hr), and exhausting to stacks SB-1 and SB-2, respectively. [326 IAC 6-2-4]

The following insignificant activities (items (b) – (h)) are subject to the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing Requirements [40 CFR Part 63, Subpart HHHHH]:

(b) Volatile Organic Compound (VOC) and Hazardous Air Pollution (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons;

(c) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs, including:

Piping losses using standard SOCMI factors for non-leaking pipes, valves, and pumps for raw materials in VOL storage tanks: ST-1, ST-4, ST-2, ST-3, ST-5, ST-6, ST-7, ST-8, ST-10, ST-11 and ST-12, and holding tanks: T1, T2, T3, T4, T5, T7, T9, T10, T11.

(d) The following adhesive holding tanks, each with the potential to emit (PTE) of less than 1 ton single HAP/year, less than 2.5 tons of a combination of HAPs/year, and less than 10 tons VOC/year, with uncontrolled emissions from conservation vents:

Holding Tank Content, ID	Installation Date	Maximum Capacity (gal)
Adhesive T-1	January 1997	6,000
Adhesive T-2	January 1997	6,000
Adhesive T-3	January 1997	3,000
Adhesive T-4	January 1997	3,000
Adhesive T-5	January 1997	3,000
Adhesive T-9	January 1997	3,000

The adhesive holding tanks have a combined throughput of 11,529 lbs/hr.

(e) Two (2) sealant holding tanks, identified as T-10 and T-11, each with a volume of 3,000 gallons, each with the potential to emit (PTE) of less than 1 ton single HAP/year, less than 2.5 tons of a combination of HAPs/year, and less than 10 tons VOC/year, which to date have not been installed;

(f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(g) A VOL storage tank, identified as ST-12, with a volume of less than 40 cubic meters but greater than 1,000 gallons, with pressure venting to the atmosphere and no emission control;

(h) Activities with VOC emissions equal to or less than 3 lbs/hour or 15 lbs/day, including:

(1) A manually operated five/fifty-five gallon sealant pail/drum line, with a maximum production capacity of 1,914 lb/hr, constructed in 1997; and

(2) A manually operated five/fifty-five gallon adhesive pail/drum line, with a maximum production capacity of 1,820 lb/hr, constructed in 1997;

(i) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr, including:

(1) Two air make-up units identified as AMU-1 & 2, each rated at 1.69 MMBtu/hr and exhausting to separate stacks; and

(2) Twenty-five natural gas fired forced air heating units, each rated at 0.4 MMBtu/hr.

(j) Application of oils, greases, lubricants or other non-volatile materials applied as temporary protective coating;

(k) Closed loop heating and cooling systems;

(l) Solvent recycling systems with batch capacity less than or equal to 100 gallons;

(m) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(n) Heat exchanger cleaning and repair;

(o) Process vessel degassing and cleaning to prepare for internal repairs;

(p) Paved and unpaved roads and parking lots with public access;

(q) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(r) A laboratory as defined in 326 IAC 2-7-1(20)(C);

(s) A one-gallon, water-based sealant canning line, constructed in March 1997, with a PTE of less than 5 tons PM (particulate matter)/year;

(t) A 465 gallon water-based adhesive mixing churn, identified as W200, with a PTE of less than 5 tons PM (particulate matter)/year, constructed in 1997 [326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)];

(u) A 1050 gallon water-based adhesive mixing churn, identified as W300, with a PTE of less than 5 tons PM (particulate matter)/year, constructed in 1997 [326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)];

(v) A 500 gallon Non-Solvent, Liquid Rubber Sealant Mixing Churn, identified as CH-52, constructed in 1997 [326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)];

(w) One (1) 350-gallon water-based adhesive mixing churn, identified as W-400, with a maximum capacity of 560 pounds of water-based adhesives per hour. The PTE is less than 5 tons PM (particulate matter)/year, constructed in 2001 [326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)].

Permitted Emission Units and Pollution Control Equipment Removed from Source

The following permitted emission units and pollution control devices have been removed from the source:

(a) A soil vapor extraction system with a maximum airflow rate of 300 actual cubic feet per minute, exhausting to the atmosphere through stack SVE-1, equipped with no controls, and constructed in 1998.

Existing Approvals

The source was issued Part 70 Operating Permit No. 141-9909-00146 on March 16, 2000. The source has since received the following approvals:

(a) First Administrative Amendment No. T141-13982-00146, issued on April 11, 2001;

(b) Second Administrative Amendment No. T141-15134-00146, issued on February 8, 2002;

(c) First Reopening No. T141-13479-00146, issued on February 13, 2002;

(d) Third Administrative Amendment No. T141-17361-00146, issued on April 15, 2003;

(e) Fourth Administrative Amendment No. T141-18640-00146, issued on April 14, 2004;

(f) Fifth Administrative Amendment No. 141-21201-00146, issued on May 24, 2005; and

(g) First Significant Permit Modification No. 141-21816-00146, issued on April 3, 2006.

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

The following conditions from previous approvals have been determined to be no longer applicable. Therefore, they were not incorporated into this Part 70 Permit.

Condition D.1.1 - Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. NSPS (40 CFR 60, Subpart Kb)

1. Reason not incorporated: The requirements of 40 CFR 60.116b(a) and (b) have been incorporated into the state rules. Therefore, these tanks are no longer subject to the recordkeeping requirements of 40 CFR 60, Subpart Kb because pursuant to 40 CFR 60.110b(b), as amended in the October 15, 2003 Federal Register, these tanks are not subject to this rule. Therefore, all conditions in permit Section D.1 have not been incorporated into this permit renewal.

Section D.2 - Facility Operation Conditions

2. Reason not incorporated: The soil vapor extraction system has been removed from the source. Therefore, the facility description for the soil extraction system has not been incorporated into this permit renewal. The facility descriptions for the two tube filling systems, the one gallon canning line, and the VOL storage tank (ST-11) have also not been incorporated into the facility description because there are no applicable requirements for these units in this permit section.

Section D.2.1- Particulate [326 IAC 6-3-2]

3. Reason not incorporated: The water based churns and solvent based churns are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). These churns are exempt from this rule pursuant to 326 IAC 6-3-1(b)(14) because each of these churns emits less than five hundred fifty-one thousandths (0.551) pounds per hour of particulates. Therefore, this condition has not been incorporated into the permit renewal.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 Permit renewal application for the purposes of this review was received on June 17, 2004 with additional information received on March 13, 2006.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

Potential to Emit of the Source

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

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

	Potential to Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Solvent Based Churns	8.42	8.42	--	<42.07**	--	--	Worst Case Single 10.69 Combined 42.07
Storage Tanks, Tube Fillers, Drum and Canning Lines, and Water Based Adhesive Churns	--	--	--	<57.53*	--	--	Worst Case Single 8.94 Combined 57.53
Natural Gas Combustion	0.14	0.56	0.04	0.40	6.16	7.33	Worst Case Single 0.13 Combined 0.14
Total PTE	8.56	8.98	0.04	<100	6.16	7.33	Worst Case Single >10 Combined >25

*Based on the limited PTE of VOCs from the five and three gallon adhesive canning lines as well as the PTE of VOCs from storage tanks, adhesive drums, the one gallon canning line, and other facilities.
**Based on the maximum allowable VOC emissions per year in order to comply with the Emission Offset limit in the permit.

(a) The potential to emit of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. Emissions of VOC will be limited to less than 100 tons per year to render 326 IAC 2-3 (Emission Offset) not applicable;

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

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

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM-10	0.00
SO_2	Not reported
VOC	36.0
CO	Not reported
NO_x	Not reported
HAP (specify)	Not reported

Air Pollution Control Justification as an Integral Part of the Process

The following justification was incorporated into this permit from the previous Part 70 permit:

(a) The “nitrogen blanket”, which is released over solvent-based sealants and adhesives in the churns during the churning process, is integral to the mixing process, due to the high explosive risk posed by oxygen levels if the nitrogen blanket were not used.

(b) During the mixing process, VOC, HAP, and PM are emitted only during intermittent nitrogen purges of the churns.

IDEM, OAQ evaluated the justifications at the time of issuance of the initial Part 70 Permit No. T141-9909-00146 issued on March 16, 2000 and agreed that the nitrogen blanket will be considered as an integral part of the churning process. Therefore, the permitting level will be determined using the potential to emit after the nitrogen blanket. Operating conditions in the proposed renewal permit will specify that this nitrogen blanket shall operate at all times that the sealant and adhesive churns are in operation.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Moderate Nonattainment
CO	Attainment
Lead	Attainment

(a) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as moderate nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(c) St. Joseph County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

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

Part 70 Permit Conditions

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

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

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

Federal Rule Applicability

(a) This Part 70 source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit as defined in 40 CFR 64.1 must meet the following three criteria for a given pollutant:

(1) The unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source;

(2) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant; and

(3) The unit uses a control device to achieve compliance with any such emission limitation or standard.

The pollutant-specific emission units at this source are not subject to the requirements of 40 CFR 64, because none of the emission units has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

(b) The requirements of New Source Performance Standard, (40 CFR 60.40c, Subpart Dc) Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units are not included in the permit for the two (2) boilers, designated as B-1 and B-2. New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart Dc) applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (MM Btu/hr) or less, but greater than or equal to 2.9 MW (10 MM Btu/hr). Boilers B-1 and B-2, each have a maximum design heat input capacity of less than 10 MM Btu/hr.

(c) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) “Standards of Performance for Volatile Organic Liquid Storage Vessels” are not included in the permit for the two (2) volatile organic liquid storage tanks, ST-1 and ST-4 with storage capacity of 95 cubic meters each. Although they were constructed after the July 23, 1984 rule applicability date, and have a storage capacity greater than 75 cubic meters but less than 151 cubic meters each, the volatile organic liquids stored in the tanks has a maximum true vapor pressure of less than 15.0 kPa each. Therefore, pursuant to 40 CFR 60.110b(b), as amended in the October 15, 2003 Federal Register, these tanks are not subject to this rule.

(d) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) “Standards of Performance for Volatile Organic Liquid Storage Vessels” are not included in the permit for the nine (9) volatile organic liquid storage tanks, ST-2, ST-3, ST-5, ST-6, ST-7, ST-8, ST-9, ST-10 and ST-11 because each tank has a storage capacity that is less than 75 cubic meters.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not included in the permit for the two (2) boilers, designated as B-1 and B-2. The boilers are part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575. Each boiler has a rated capacity of less than or equal to 10 million British thermal units per hour heat input. Pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for an affected source in the small gaseous fuel subcategory.

(f) The requirements of 40 CFR 63, Subpart HHHHH are applicable to miscellaneous coating manufacturing operations including process vessels greater than or equal to 250 gallons in capacity, storage tanks for feedstocks and products, components such as pumps, compressors, agitators, etc., wastewater tanks and transfer racks, located at a major source of HAPs. The source does not operate any wastewater streams, transfer operations, or heat exchange systems. The compliance date for this NESHAP is December 11, 2006. The following is a list of the emission units that are subject to this subpart:

(1) The following adhesive and sealant churns, each containing a nitrogen blanket purging system which is integral to the churning process, each exhausting to its respective vent and equipped with its respective condenser for VOC control:

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Sealant CH-9	S-9	CE-9	June 1998	900
Sealant CH-10	S-10	CE-10	June 1998	900
Sealant CH-27	S-27	CE-27	March 2001	1,522
Sealant CH-28	S-28	CE-28	April 2003	500
Sealant CH-53	S-53	CE-53	November 1996	500

Churn Content ID	Stack ID	Condenser ID	Installation Date	Volume (gal)
Adhesive CH-1	S-1	CE-1	November 1996	330
Adhesive CH-2	S-2	CE-2	November 1996	330
Adhesive CH-22	S-22	CE-22	June 1998	2,000
Adhesive CH-25	S-25	CE-25	April 1999	750
Adhesive CH-26	S-26	CE-26	November 1996	1,500
Adhesive CH-29	S-29	CE-29	May 2005	3,000
Adhesive CH-54	S-54	CE-54	November 1996	550
Adhesive CH-55	S-55	CE-55	November 1996	560
Adhesive CH-56	S-56	CE-56	November 1996	600

(2) A five and three gallon adhesive canning line, with a maximum production of 8,291 lb/hr, with no VOC control, constructed in April 1997;

(3) A one gallon adhesive canning line, with a maximum production of 3,238 lb/hr, with no VOC control, constructed in April 1997;

(4) Two (2) tube filling systems: a double-head system, and a high-speed-single-head system. These systems have a combined maximum production capacity of 3,627 lbs/hr, with no VOC control;

(5) A VOL storage tank, identified as ST-11, with a volume of less than 40 cubic meters but greater than 1,000 gallons, erected in 1987 but not yet constructed/used, with pressure venting to the atmosphere and no emission control;

(6) Two (2) Volatile Organic Liquid (VOL) storage tanks, identified as ST-1 and ST-4, each with a volume of 95 cubic meters and a vapor pressure less than 15.0 kiloPascals, constructed in 1986, with pressure venting to the atmosphere and no emission control;

(7) Six (6) VOL storage tanks, identified as ST-2, ST-3, ST-5, ST-6, ST-7 and ST-8, each with a volume of 57 cubic meters, constructed in 1986, with pressure venting to the atmosphere and no emission control;

(8) Two (2) VOL storage tanks, identified as ST-9 and ST-10, each with a volume of less than 40 cubic meters but greater than 1,000 gallons, constructed in 1987, with pressure venting to the atmosphere and no emission control;

(9) Volatile Organic Compound (VOC) and Hazardous Air Pollution (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons;

(10) Volatile Organic Compound (VOC) and Hazardous Air Pollution (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons;

(11) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs, including:

Piping losses using standard SOCMI factors for non-leaking pipes, valves, and pumps for raw materials in VOL storage tanks: ST-1, ST-4, ST-2, ST-3, ST-5, ST-6, ST-7, ST-8, ST-10, ST-11 and ST-12, and holding tanks: T1, T2, T3, T4, T5, T7, T9, T10, T11.

(12) The following adhesive holding tanks, each with the potential to emit (PTE) of less than 1 ton single HAP/year, less than 2.5 tons of a combination of HAPs/year, and less than 10 tons VOC/year, with uncontrolled emissions from conservation vents:

Holding Tank Content, ID	Installation Date	Maximum Capacity (gal)
Adhesive T-1	January 1997	6,000
Adhesive T-2	January 1997	6,000
Adhesive T-3	January 1997	3,000
Adhesive T-4	January 1997	3,000
Adhesive T-5	January 1997	3,000
Adhesive T-9	January 1997	3,000

(13) Two (2) sealant holding tanks, identified as T-10 and T-11, each with a volume of 3,000 gallons, each with the potential to emit (PTE) of less than 1 ton single HAP/year, less than 2.5 tons of a combination of HAPs/year, and less than 10 tons VOC/year, which to date have not been installed;

(14) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(15) A VOL storage tank, identified as ST-12, with a volume of less than 40 cubic meters but greater than 1,000 gallons, with pressure venting to the atmosphere and no emission control; and

(16) Activities with VOC emissions equal to or less than 3 lbs/hour or 15 lbs/day, including:

(i) A manually operated five/fifty-five gallon sealant pail/drum line, with a maximum production capacity of 1,914 lb/hr, constructed in 1997; and

(ii) A manually operated five/fifty-five gallon adhesive pail/drum line, with a maximum production capacity of 1,820 lb/hr, constructed in 1997.

The source will comply with 40 CFR 63.8000(a) by meeting the emission limits and work practices in (2)(b)(iii) of Table 1 (40 CFR 63, Subpart HHHHH). In order to comply with 40 CFR 63.8000(a) the process vessels, defined as any stationary or portable tank or other vessel with a capacity greater than or equal to 250 gal and in which mixing, blending, diluting, dissolving, temporary holding, and other processing steps occur in the manufacturing of a coating, will be equipped with a tightly fitting vented cover or lid that will be closed at all times that the vessels contain HAPs. The total organic HAP emissions will be reduced by venting emissions through a closed vent system to a condenser that reduces the outlet gas temperature to less than 2 degrees Celsius.

The source will comply with 40 CFR 63.8015(a) by meeting the requirements in (1)(a), or (1)(b), or (1)(c) of Table 3 (40 CFR 63, Subpart HHHHH).

The source does not operate any wastewater streams, transfer operations, or heat exchange systems. As such, the source is not subject to the requirements of 40 CFR 63.8020, 63.8025, or 63.8030.

Pursuant to 40 CFR 63.8075(a) the source is required to submit to the USEPA and IDEM the following reports as specified in Table 9 of 40 CFR 63,to Subpart HHHHH:

(a) A pre-compliance report is due by June 11, 2006;

(b) A notification of compliance status report is due 150 days after December 11, 2006;

(c) A semi-annual compliance report starting 240 days after December 11, 2006 and every six months thereafter. The first compliance report will cover the time period from December 11, 2006 to June 11, 2007.

Non applicable portions of the NESHAP will not be included in the permit. The above emission units are subject to the following portions of Subpart HHHHH:

(1) 40 CFR 63.7980
(2) 40 CFR 63.7985(a)
(3) 40 CFR 63.7985(a)(1)
(4) 40 CFR 63.7985(a)(2)
(5) 40 CFR 63.7985(a)(3)
(6) 40 CFR 63.7985(a)(4)
(7) 40 CFR 63.7985(b)
(8) 40 CFR 63.7985(b)(1)
(9) 40 CFR 63.7985(b)(2)
(10) 40 CFR 63.7985(b)(3)
(11) 40 CFR 63.7985(c)
(12) 40 CFR 63.7985(d)(3)
(13) 40 CFR 63.7990(a)
(14) 40 CFR 63.7990(b)
(15) 40 CFR 63.7995(b)
(16) 40 CFR 63.7995(d)
(17) 40 CFR 63.8000(a)
(18) 40 CFR 63.8000(b)(1)
(19) 40 CFR 63.8000(b)(2)
(20) 40 CFR 63.8000(d)(1)
(21) 40 CFR 63.8000(d)(6)
(22) 40 CFR 63.8000(d)(7)
(23) 40 CFR 63.8005(a)
(24) 40 CFR 63.8005(c)

(25) 40 CFR 63.8005(d)(1)
(26) 40 CFR 63.8005(d)(2)
(27) 40 CFR 63.8005(d)(3)
(28) 40 CFR 63.8005(d)(4)
(29) 40 CFR 63.8005(e)(1)
(30) 40 CFR 63.8005(e)(2)
(31) 40 CFR 63.8005(f)
(32) 40 CFR 63.8010(a)
(33) 40 CFR 63.8010(b)(1)
(34) 40 CFR 63.8010(b)(2)
(35) 40 CFR 63.8010(c)
(36) 40 CFR 63.8010(d)
(37) 40 CFR 63.8010(d)(1)
(38) 40 CFR 63.8010(d)(2)
(39) 40 CFR 63.8015(a)
(40) 40 CFR 63.8015(d)
(41) 40 CFR 63.8050(a)
(42) 40 CFR 63.8050(b)(1)
(43) 40 CFR 63.8050(b)(2)
(44) 40 CFR 63.8050(c)
(45) 40 CFR 63.8050(c)(1)
(46) 40 CFR 63.8050(c)(1)(i)
(47) 40 CFR 63.8050(c)(1)(ii)
(48) 40 CFR 63.8050(c)(3)
(49) 40 CFR 63.8050(c)(4)
(50) 40 CFR 63.8050(d)(1)
(51) 40 CFR 63.8050(d)(2)
(52) 40 CFR 63.8050(e)
(53) 40 CFR 63.8055(a)
(54) 40 CFR 63.8055(b)
(55) 40 CFR 63.8055(b)(1)
(56) 40 CFR 63.8055(b)(2)
(57) 40 CFR 63.8055(b)(3)
(58) 40 CFR 63.8055(b)(4)
(59) 40 CFR 63.8070(a)
(60) 40 CFR 63.8070(b)(1)
(61) 40 CFR 63.8070(c)
(62) 40 CFR 63.8075(a)
(63) 40 CFR 63.8075(b)
(64) 40 CFR 63.8075(c)
(65) 40 CFR 63.8075(d)(1)
(66) 40 CFR 63.8075(d)(2)
(67) 40 CFR 63.8075(d)(2)(i)
(68) 40 CFR 63.8075(d)(2)(ii)
(69) 40 CFR 63.8075(d)(2)(iii)
(70) 40 CFR 63.8075(d)(2)(iv)
(71) 40 CFR 63.8075(d)(2)(v)
(72) 40 CFR 63.8075(e)(except for (e)(7)
(73) 40 CFR 63.8080(a)
(74) 40 CFR 63.8080(b)
(75) 40 CFR 63.8080(c)
(76) 40 CFR 63.8080(d)
(77) 40 CFR 63.8080(f)
(78) 40 CFR 63.8080(g)
(79) 40 CFR 63.8095
(80) 40 CFR 63.8100

(81) 40 CFR 63.8105
(82) Table 1- (2)(b)(iii)
(83) Table 2- Group 1a (1)(a) and (1)(b)
(84) Table 3- (1)(a), (1)(b), or (1)(c)
(85) Table 9
(86) Table 10

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart HHHHH.

State Rule Applicability – Entire Source

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5-1(b), the requirements of 326 IAC 6-5 do not apply. This source is not subject to the requirements of this rule because it is not a new source of fugitive particulate emissions and fugitive emissions are negligible.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)

(a) This source was originally constructed in 1986, which is after the August 7, 1977 rule applicability date. Pursuant to 326 IAC 2-2 (PSD), this source was a minor stationary source in 1986 since it is not one of the 28 listed source categories and it had the potential to emit less than 250 tons per year of all attainment pollutants. St. Joseph County is now a moderate nonattainment area for 8-hour ozone. The increase in purge times permitted under Significant Permit Modification No. 141-21816-00146 increased potential VOC emissions above 100 tons per year. Actual emissions of VOC are below 100 tons per year. In this renewal a condition has been added to the permit to limit VOC emissions to less than 100 tons per year. As such, this source remains a minor source under PSD and the modification is minor under 326 IAC 2-2 (PSD) because the potential to emit did not increase for any regulated pollutant. The source is also a minor source under 326 IAC 2-3 (Emission Offset) because the source has limited emissions of VOC of less than 100 tons per year and the emissions of NOx are less than 100 tons pear year. Therefore, the source is not subject to the requirements of 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offset).

(b) Prior to August 7, 2006, St. Joseph County was located in a nonattainment area for 1-hour ozone. On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule. St. Joseph County is now in attainment for 1-hour ozone and the PSD major source threshold is 250 tons pear year of VOC or NOx. Since the source's emissions of VOC and NOx are each less than 100 tons per year as stated above, the source is a minor source under 326 IAC 2-2 (PSD).

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAP, is constructed or reconstructed after July 27, 1997, and is not subject to the requirements of any subpart under NESHAP, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Emission units CH-9, CH-10, CH-22, CH-25, CH-27, CH-29, and the five and three gallon canning line were constructed or reconstructed after the July 27, 1997 rule applicability date. Churns CH-9, CH-10, CH-25, Ch-27, and CH-29 have the potential to emit of less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs; therefore these emission units are not subject to 326 IAC 2-4.1-1. Although CH-22, and the five and three gallon canning line were constructed or reconstructed after the July 27, 1997 rule applicability date and have a potential to emit of more than 10 tons per year of any HAP or 25 tons per year of the combination of HAP, these facilities are subject to NESHAP Subpart HHHHH. Therefore, pursuant to 326 IAC 2-4.1(b)(2) the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This rule is not applicable because the source began operation after January 1, 1980.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in St. Joseph County. Therefore, this rule is not applicable to this source.

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d))

This rule establishes limitations for sources of indirect heating, receiving permits to construct on or after September 21, 1983. The two (2) boilers, identified as B-1 and B-2 are subject to the requirements of 326 IAC 6-2-4 because these boilers were constructed after the September 21, 1983 rule applicability date.

Pursuant to 326 IAC 6-2-4(a), the PM emissions from each of the two boilers based on a heat input rate of 1.68 MMBtu per hour each, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.

$Pt = 1.09/(1.68)^{0.26} = 0.95$ lb/MMBtu

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 pound per MMBtu heat input. Therefore, since the allowable PM emission rate specified in 326 IAC 6-2-4(a) is lower than the allowable emission rate calculated above (0.95 pounds per MMBtu) the two (2) boilers are limited to 0.60 pounds of PM per MMBtu heat input each. Based on the potential to emit calculations, the particulate matter emission from each of the two (2) boilers is 0.006 pound per MMBtu heat input (see page 4 of 5, Appendix A). Therefore, the boilers will comply with 326 IAC 6-2-4.

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

(a) The adhesive and sealant churns are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). These churns are exempt from this rule pursuant to 326 IAC 6-3-1(b)(14) because each of these churns emits less than five hundred fifty-one thousandths (0.551) pounds of particulate per hour.

(b) The water based churns are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). These churns are exempt from this rule pursuant to 326 IAC 6-3-1(b)(14) because each of these churns emits less than five hundred fifty-one thousandths (0.551) pounds of particulate per hour.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. The adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-26, CH-29, CH-54, CH-55, CH-56, and the sealant churns CH-9, CH-10, CH-7, CH-8, CH-28, CH-27, and CH-53, each of which contain a nitrogen blanket purging system which is integral to the mixing process, are not subject to BACT, because each churn has the PTE less than 25 tons VOC/year when worst-case batch purge times are limited to 45 minutes/batch for sealant churns CH-7, CH-8, CH-9, CH-10, CH-27, CH-28 and CH-53, 10 minutes/batch for adhesive churns CH-1, CH-2 and CH-54, 5 minutes/batch for adhesive churn CH-3, 55 minutes/batch for adhesive churn CH-22, 9.5 minutes/batch for adhesive churns CH-25, CH-26, CH-55 and CH-56, and 45 minutes/batch for adhesive churn CH-29, and the maximum number of batches per day is limited to 1 batch per day for sealant churns CH-7, CH-8, CH-9, CH-10, CH-27, CH-28 and CH-53 and adhesive churns CH-1, CH-2, CH-22, CH-29 and CH-54, 2 batches per day for adhesive churn 3, and 6 batches per day for adhesive churns CH-25, CH-26, CH-55 and CH-56.

Therefore, the maximum amount of time for batch purging shall be limited as specified above for adhesive churns CH-1, CH-2, CH-3, CH-22, CH-25, CH-26, CH-29, CH-54, CH-55, and CH-56, and for sealant churns CH-9, CH-10, CH-7, CH-8, CH-27, CH-28, and CH-53, so that potential VOC emission will remain less than 25 tons/year and the requirements of 326 IAC 8-1-6 (BACT) will not apply.

The Soil Vapor Extraction Unit, Sealant Tube Fillers, One Gallon. Adhesive Canning Line and 55 Gallons. Sealant and Adhesive Drum Lines are not subject to 326 IAC 8-1-6 (BACT) due to their PTE VOC less than 25 tons/year.

Any change or modification, which may increase potential to emit VOC from the Soil Vapor Extraction Unit, Sealant Tube Fillers, one gallon Adhesive Canning Line and 55 gallon Sealant and Adhesive Drum Lines to 25 tons per year or more, shall require approval from IDEM, OAQ, prior to making the change.

The five and three gallon adhesive canning line, with a PTE VOC > 25 tons/year, is potentially subject to the requirements of BACT. The PTE VOC from the five and three gallon adhesive canning line is 33.73 tons/year, as determined below:

PTE VOC (tons/year) = maximum input VOC (tons/year) * efficiency factor (%)

maximum input VOC = max. churned adhesive * adhesive VOC concentration

maximum churned adhesive = 8291 lbs/hr or 36,315 tons/year

adhesive VOC concentration = 71 %

Therefore: maximum input VOC = 25,784 tons / year

efficiency factor, provided by Royal Adhesives and Sealants, L.L.C. through weight loss measurements in the Part 70 Permit No. T141-9909-00146, issued on March 16, 2000 = 0.1308 percent.

Therefore: PTE VOC = 25,784 * 0.1308 % = 33.73 tons/year

VOC input to the five and three gallon adhesive canning process shall be limited to less than 19,111 tons per 12 consecutive month period by the following ratio:

$$\frac{\text{maximum input VOC}}{\text{PTE VOC}} = \frac{\text{limited input VOC}}{\text{limited PTE VOC}}$$

Therefore: $\frac{\text{25,784 tons/year}}{\text{33.73 tons/year}} = \frac{\text{limited input VOC}}{\text{25 tons/year}}$

Therefore: limited input VOC = 19,111 tons / year
input VOC limit less than 19,111 tons/consecutive 12 month period

This input VOC limit will render the requirements of 326 IAC 8-1-6 (BACT) not applicable to the five and three gallon adhesive canning line.

Compliance Requirements

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

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

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

1 Adhesive churns CH-1, CH-2, CH-3, CH-4, CH-22, CH-25, CH-26, CH-29, CH-54, CH-55, CH-56, and sealant churns CH-9, CH-10, CH-7, CH-8, CH-27, CH-28, and CH-53, each of which contain a nitrogen blanket purging system which is integral to the mixing process, have applicable compliance monitoring conditions as specified below:

(a) Once each calendar year, the source shall observe and record the number of minutes during an entire cycle of mixing that each adhesive churn and each sealant churn purges when mixing a worst-case formula for that churn.

(b) Such records shall include identification of the churn, identification of formula, batch size, total number of hours churned, and total number of minutes that purging occurred. Such records shall remain on site for 5 years from the time of record.

These monitoring conditions are necessary to ensure that maximum time for batch purging time for adhesive churns (CH-1, CH-2, CH-3, CH-4, CH-22, CH-25, CH-26, CH-29, CH-54, CH-55, CH-56,) and for sealant churns (CH-9, CH-10, CH-7, CH-8, CH-27, CH-28, and CH-53), shall be limited in accordance with Condition D.1.1(a) such that potential VOC emissions from each adhesive and sealant churn will remain less than 25 tons/year and 326 IAC 8-1-6 (BACT) will not apply.

Conclusion

The operation of this sealant and adhesive production plant shall be subject to the conditions of this Part 70 Permit renewal No. T141-19496-00146.

Appendix A: Emission Calculations

Company Name: Royal Adhesives and Sealants, L.L.C.
Address City IN Zip: 2001 West Washington Street, South Bend, IN 46628-2032
Part 70 Renewal No.: T141-19496-00146
Reviewer: Tanya White/EVP
Date: Oct-06

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Storage Tanks, Tube Fillers, Drum and Canning Lines, and Water Based Adhesive Churns	Solvent Based Churns	**TOTAL**
PM	0.14	negl.	8.42	8.56
PM10	0.56	negl.	8.42	8.97
SO2	0.04	negl.	negl.	0.04
NOx	7.33	negl.	negl.	7.33
VOC	0.40	66.26	93.54	160.20
CO	6.16	negl.	negl.	6.16
total HAPs	0.14	66.26	80.23	146.63
worst case single HAP	0.13	8.85	10.69	

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Storage Tanks, Tube Fillers, Drum and Canning Lines, and Water Based Adhesive Churns	Solvent Based Churns	**TOTAL**
PM	0.14	negl.	5.34	5.48
PM10	0.56	negl.	5.34	5.90
SO2	0.04	negl.	negl.	0.04
NOx	7.33	negl.	negl.	7.33
VOC	0.40	<57.53	93.54	<151.48
CO	6.16	negl.	negl.	6.16
total HAPs	0.14	57.53	80.23	137.90
worst case single HAP	0.13	8.85	10.69	

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

Appendix A: Emissions Summary from Storage Tanks, Tube Fillers, Drum and Canning Lines, and Water Based Adhesive Churns
VOC, HAPs and Particulate

Company Name: Royal Adhesives and Sealants, L.L.C.
Address City IN Zip: 2001 West Washington Street, South Bend, IN 46628-2032
Part 70 Renewal No.: T141-19496-00146
Reviewer: Tanya White/EVP
Date: Oct-06

Potentials to Emit for Storage Tanks, Tube Fillers, Drum and Canning Lines, and Water Based Adhesive Churns

Emission	Annual	Potential to Emit (tons/year)								Reference
Unit	Throughput (gal/yr	PM	VOC	Total HAP	Toluene	Hexane	Xylene	MEK	Heptane	
ST-1	5,370,000	negl.	0.46	0.46	0.46	negl.	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
ST-2	1,020,540	negl.	1.51	1.51	negl.	1.51	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
ST-3	377,160	negl.	0.046	0.046	negl.	negl.	0.046	negl.	negl.	Part 70 Permit No. T141-9909-00146
ST-4	377,160	negl.	0.29	0.29	negl.	negl.	negl.	0.29	negl.	Part 70 Permit No. T141-9909-00146
ST-5	377,160	negl.	0.22	0.22	negl.	negl.	negl.	negl.	0.22	Part 70 Permit No. T141-9909-00146
ST-6	1,020,540	negl.	1.04	1.04	negl.	1.04	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
ST-7	377,160	negl.	0.22	0.22	negl.	negl.	negl.	negl.	0.22	Part 70 Permit No. T141-9909-00146
ST-8	377,160	negl.	0.67	0.67	negl.	negl.	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
ST-10	179,000	negl.	0.06	0.06	0.06	negl.	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
ST-11	224,000	negl.	0.07	0.07	0.07	negl.	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
ST-12	192,000	negl.	0.37	0.37	negl.	0.37	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
Double+High Speed Single Head Tube Fillers	n/a	negl.	8.26	8.26	8.26	negl.	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
1 gal. Adhesive Canning Line	n/a	negl.	6.2	6.2	n/a	n/a	n/a	n/a	n/a	Part 70 Permit No. T141-9909-00146
5 and 3 gal. Adhesive Canning Lines*	n/a	negl.	33.73	33.73	n/a	n/a	n/a	n/a	n/a	Part 70 Permit No. T141-9909-00146
W-200	n/a	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
W-300	n/a	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
W-400	n/a	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	Part 70 Permit No. T141-9909-00146
5/55-gal. Adhesive Pail/Drum Line	n/a	negl.	7.4	7.4	n/a	n/a	n/a	n/a	n/a	Part 70 Permit No. T141-9909-00146
5/55-gal. Sealant Pail/Drum Line	n/a	negl.	5.71	5.71	n/a	n/a	n/a	n/a	n/a	Part 70 Permit No. T141-9909-00146
Totals		**negl.**	**66.256**	**66.256**	**8.85**	**2.92**	**0.046**	**0.29**	**0.44**	

*VOC emissions from the five and three gallon adhesive canning line must be limited to less than 25 tons pear year to preclude applicability of 326 IAC 8-1-6 (BACT)

Appendix A: Comparisons of Worst Case Potentials to Emit for Solvent Based Churns-AP-42 vs. N2 Blanket Purges
VOC, HAPs and Particulate

Company Name: Royal Adhesives and Sealants, L.L.C.
Address City IN Zip: 2001 West Washington Street, South Bend, IN 46628-2032
Part 70 Renewal No.: T141-19496-00146
Reviewer: Tanya White/EVP
Date: Oct-06

Emission Unit	Number of Batches per Day	Solids per Batch (lb)	VOC per Batch (lb)	HAP per Batch (lb)	Potential to Emit - AP-42* (tons/year)			Length of Purging Time per Batch (mts)	Pounds VOC Emitted per Hour of Purging	Total Length of Mixing Time per Batch (mts)	Potential to Emit - N2 blanket purges** (tons/year)			Controlled Potential to Emit - N2 blanket purges******* (tons/year)
					Particulates**	VOC	Total HAPs				Particulates***	VOC****	HAPs*****	Particulates
CH-1	1	330	2176	2176	0.60	7.94	7.94	10	61.65	360	0.02	1.88	1.88	0.00
CH-2	1	330	2176	2176	0.60	7.94	7.94	10	61.65	360	0.02	1.88	1.88	0.00
CH-3******	2	n/a	n/a	n/a	0.88	1.31	1.31	5						
CH-7	1	909	905	905	1.66	3.30	3.30	45	13.93	480	0.16	1.91	1.91	0.00
CH-8	1	909	905	905	1.66	3.30	3.30	45	13.93	480	0.16	1.91	1.91	0.00
CH-9	1	n/a	n/a	n/a	13.49	22.2	22.2	45	13.93	n/a	n/a	1.91	1.91	n/a
CH-10	1	n/a	n/a	n/a	19.80	16.29	8.65	45	13.93	n/a	n/a	1.91	1.01	n/a
CH-22	1	n/a	n/a	n/a	15.72	23.74	23.74	55	61.65	n/a	n/a	10.31	10.31	n/a
CH-25	6	1323	4130	1870	14.49	90.45	40.95	9.5	61.65	120	1.15	10.69	4.84	0.00
CH-26	6	2541	7976	4476	27.82	174.67	98.02	9.5	61.65	120	2.20	10.69	6.00	2.20
CH-27	1	9921	4907	4907	18.11	17.91	17.91	45	61.65	675	1.21	8.44	8.44	1.21
CH-28	1	2462	1218	1218	4.49	4.45	4.45	45	61.65	730	0.28	8.44	8.44	0.28
CH-29	1	13984	6917	6917	25.52	25.25	25.25	45	61.65	930	1.23	8.44	8.44	1.23
CH-53	1	2141	2227	2227	3.91	8.13	8.13	45	13.93	420	0.42	1.91	1.91	0.42
CH-54	1	450	2880	0	0.82	10.51	0.00	10	61.65	240	0.03	1.88	0.00	0.00
CH-55	6	588	3000	2999	6.44	65.70	65.68	9.5	61.65	120	0.51	10.69	10.69	0.00
CH-56	6	1201	2960	2960	13.15	64.82	64.82	9.5	61.65	120	1.04	10.69	10.69	0.00
Total					**169.16**	**547.92**	**403.61**				**8.42**	**93.54**	**80.23**	**5.34**

Note: The above emissions are based on the existing Part 70 Permit No. T141-9909-00146, issued on March 16, 2000
*Based on AP-42 Section 6.4.1 (paint manufacturing) 2% of solvent and 1% of particulates will be emitted during the mixing proces
**Based on stack tests results during purging of N2 blanke
***Particulates = Particulates** X Length of Purging Time per Batch/Total Length of Mixing Time per Bat
****VOC = batches/day X minutes purged/per batch X pounds VOC emitted/hour of purging X 1 hour/60 mts. X 365 days/year X 1 ton/2000 poun
*****Total HAPs from purging were considered to be emitted proportionately to VOC from purging
HAP Emissions = (VOC Emissions (tons/yr)) * (Weight of HAPs/Weight of VOCs (lb/batch))
******CH-3 is not equipped with N purging
*******Particulate emissions from churns CH-1, CH-2, CH-3, CH-7, CH-8, CH-25, CH-54, CH-55, and CH-56 are controlled by a cartridge type dust collector with a 99.9 % control efficiency.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boilers and Miscellaneous Combustion Sources

Company Name: **Royal Adhesives and Sealants, L.L.C.**
Address City IN Zip: **2001 West Washington Street, South Bend, IN 46628-2032**
Part 70 Renewal No.: **T141-19496-00146**
Reviewer: **Tanya White/EVP**
Date: **Oct-06**

Emission Unit ID	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Boiler B-1	1.68	14.7
Boiler B-2	1.68	14.7
Air Make-up Units AMU-1 & 2	3.38	29.6
25 Air Heating Units	10.00	87.6
	16.8	147.168

Pollutant	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Boiler B-1 Potential Emission in tons/yr	0.01	0.06	0.00	0.74	0.04	0.62
Boiler B-2 Potential Emission in tons/yr	0.01	0.06	0.00	0.74	0.04	0.62
Air Make-up Units AMU-1 & 2 Potential Emission in tons/yr	0.03	0.11	0.01	1.48	0.08	1.24
25 Air Heating Units Potential Emission in tons/yr	0.08	0.33	0.03	4.38	0.24	3.68
Total Emissions in tons/yr	**0.14**	**0.56**	**0.04**	**7.33**	**0.40**	**6.16**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boilers and Miscellaneous Combustion Sources
HAPs Emissions

Company Name: **Royal Adhesives and Sealants, L.L.C.**
Address City IN Zip: **2001 West Washington Street, South Bend, IN 46628-2032**
Part 70 Renewal No.: **T141-19496-00146**
Reviewer: **Tanya White/EVP**
Date: **Jul-06**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.540E-04	8.799E-05	5.499E-03	1.320E-01	2.493E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	**Total (ton/yr)**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.034E-05	8.875E-05	1.130E-04	3.066E-05	1.694E-04	**1.384E-01**

Methodology is the same as page 4.

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