



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 20, 2004

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

TO: Interested Parties / Applicant
RE: MonoSol, LLC / 127-20422-00100
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

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December 20, 2004

Ms. Melanie Korczek
MonoSol, LLC
1701 County Line Road
Portage, Indiana 46368

Re: 127-20422-00100
First Administrative Amendment to
Part 70 127-18251-00100

Dear Ms. Korczek:

MonoSol, LLC was issued a Part 70 Operating Permit (No. T 127-18251-00100) on October 7, 2004 for a stationary polyvinyl alcohol (PVOH) film manufacturing plant located at 1701 County Line Road, Portage, Indiana 46368. A letter requesting changes to the permit was received on November 22, 2004. The source requested that the normal pressure drop range requirement for the baghouse (fabric filters and bin vent filters) in Section D.1.5 - Parametric Monitoring be changed.

Upon further review of the permit and the associated Technical Support Document, it was determined by OAQ that parametric monitoring is not required for either the fabric filters or the bin vent filters, since the uncontrolled potential to emit of particulate matter from each of the units (Silos #1, #2, and #3, and weigh hopper systems 1 and 2) was less than the particulate emission limit determined using the emission limit equation contained in 326 IAC 6-3-2. Therefore, the requirements and conditions of Sections D.1.2 through D.1.8 are not applicable to the source and the permit is being revised accordingly. This change to the permit qualifies as a "revision to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term", under 326 IAC 2-8-10, Administrative Permit Amendments. Pursuant to the provisions of 326 IAC 2-8-10, of Sections D.1.2 through D.1.8 of the permit (including the Table of Contents) is hereby administratively amended as follows with deleted language as ~~strikeouts~~:

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

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

~~Compliance Determination Requirements~~

~~D.1.3 Particulate Control~~

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

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

~~D.1.4 Visible Emissions Notations~~

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

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

D.1.5 Parametric Monitoring

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

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

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

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

D.1.7 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

- (a) ~~For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

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

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

~~D.1.8 Record Keeping Requirements~~

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

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nathan Bell, at (800) 451-6027, press 0 and ask for Nathan Bell or extension (4-3350), or dial (317) 234-3350.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

NCB

cc: File - Porter County
U.S. EPA, Region V
Porter County Health Department
IDEM Northwest Regional Office
Air Compliance Section Inspector - Michael Hall
Compliance Data Section
Administrative and Development



Joseph E. Kernan
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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

MonoSol, LLC
1701 County Line Road
Portage, Indiana 46368

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T127-18251-00100	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 7, 2004 Expiration Date: October 7, 2009
First Administrative Amendment No.: 127-20422-00100	Pages Affected: 3, 24, 25, 26
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 20, 2004

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SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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