



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: March 24, 2005  
RE: G.E. Plastics Mt Vernon, Inc / 129-20673-00002  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Mitchell E. Daniels, Jr.  
Governor

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Commissioner

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Ms. Lisa Carter  
GE Plastics Mt. Vernon, Inc.  
1 Lexan Lane  
Mt. Vernon, Indiana 47620

March 24, 2005

Re: Minor Source Modification No:  
129-20673-00002

Dear Ms. Carter:

GE Plastics Mt. Vernon, Inc., applied for a Part 70 operating permit on October 6, 1996 for a plastic manufacturing plant. An application to modify the source was received on February 1, 2005. Pursuant to 326 IAC 2-7-10.5, the following emission units to be located in Structured Products Area, are approved for construction at the source:

- (a) Two (2) plastic film web coating lines, identified as C7A and C7B, to be constructed in 2005, and exhausting through S/V #10-358 and S/V #10-359, respectively.
- (b) One (1) plastic film web coating line, identified as C8, to be constructed in 2006, and exhausting through S/V #10-360.

Note: The maximum process rate and the maximum coating usage information of the units included in this source modification is treated as confidential information.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operating upon issuance of the source modification approval.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,  
Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
ERG/YC

cc: File – Posey County  
U.S. EPA, Region V  
Posey County Health Department  
Southwest Regional Office  
Air Compliance Section Inspector – Derrick Ohning  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling - Michele Boner  
Title V Reviewer – ERG/JR



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[www.IN.gov/idem](http://www.IN.gov/idem)

## **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY**

**GE Plastics Mt. Vernon, Inc.  
1 Lexan Lane  
Mt. Vernon, Indiana 47620**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval 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.

Minor Source Modification No.: 129-20673-00002	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 24, 2005

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## SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary plastics manufacturing plant.

Responsible Official:	President General Manager
Source Address:	1 Lexan Lane, Mt. Vernon, Indiana 47620
Mailing Address:	1 Lexan Lane, Mt. Vernon, Indiana 47620
General Source Phone Number:	(812) 831-7000
SIC Code:	2821
County Location:	Posey
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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This stationary source is approved to construct and operate the following emission units to be located in Structured Products Area:

- (a) Two (2) plastic film web coating lines, identified as C7A and C7B, to be constructed in 2005, and exhausting through S/V #10-358 and S/V #10-359, respectively.
- (b) One (1) plastic film web coating line, identified as C8, to be constructed in 2006, and exhausting through S/V #10-360.

Note: The maximum process rate and the maximum coating usage information of the units included in this source modification is treated as confidential information.

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### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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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 CONSTRUCTION CONDITIONS**

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

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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      Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.3      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.4      Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]**

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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

## GENERAL OPERATION CONDITIONS

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

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 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]

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- (a) The Permittee shall maintain a Preventive Maintenance Plan (PMP) for the source as described in 326 IAC 1-6-3. At a minimum, the PMP shall include:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for the unit.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**C.4 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.7 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

**C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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

C.10 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have a Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan under 40 CFR 63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken.

The Parametric Monitoring and SSM Plan shall be submitted within the time frames specified by the applicable 40 CFR 63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the Southwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ

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

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Southwest Regional Office

Telephone No.: 1-888-672-8323, or

Telephone No. 812-380-2305

Facsimile No.: 812-380-2304

- (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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c) 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.

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

#### **C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]**

- (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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq)) at a existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr)), the Permittee shall comply with following:
  - (1) Prior to commencing the construction of “project” (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project;
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project;
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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
- (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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq)), and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report shall be submitted within sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
  - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) Two (2) plastic film web coating lines, identified as C7A and C7B, to be constructed in 2005, and exhausting through S/V #10-358 and S/V #10-359, respectively.
- (b) One (1) plastic film web coating line, identified as C8, to be constructed in 2006, and exhausting through S/V #10-360.

Note: The maximum process rate and the maximum coating usage information of the units included in this source modification is treated as confidential information.

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

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

#### D.1.1 PSD Minor Limits [326 IAC 2-2]

The total VOC input to the plastic film coating lines C7A, C7B, and C8 is less than 40 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable. Any change or modification which may increase the VOC input to these three (3) coating lines greater than 40 tons per year must be approved by the Office of Air Quality before any such change may occur.

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

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not discharge into the atmosphere any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating applicator for each of the plastic coating lines C7A, C7B, and C8.

#### D.1.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart JJJJ]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart JJJJ. The Permittee must comply with these requirements on and after December 5, 2002.

#### D.1.4 National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating [40 CFR 63.3290] [40 CFR 63.3300] [40 CFR 63.3310] [40 CFR 63.3330(a)]

- (a) The provisions of 40 CFR Part 63, Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/fabric/fabricpg.html>. Pursuant to 40 CFR 63.3330(a), the Permittee must comply with these requirements on and after December 5, 2005.
- (b) The affected source subject to 40 CFR 63, Subpart JJJJ is the collection of all web coating lines at this facility. This includes web coating lines engaged in the coating of metal webs that are used in flexible packaging, and web coating lines engaged in the coating of fabric substrates for use in pressure sensitive tape and abrasive materials.
- (c) Terminologies used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3310, and are applicable to the affected source.

### Compliance Determination Requirements

#### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2]

Compliance with the VOC usage limit contained in Condition D.1.1 and the VOC content limit contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-

1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of the VOC content of each coating material used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.7 Notification Requirements [40 CFR 63.3400 (a), (b), and (e)]**

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- (a) General. Pursuant to 40 CFR 63.3400(a) and 40 CFR 63.3420, the Permittee must submit the reports specified in 40 CFR 63.3400, paragraphs (b) through (g) to IDEM, OAQ.
- (b) Initial notification. Pursuant to 40 CFR 63.3400(b), the Permittee must submit an initial notification as required by 40 CFR 63.9(b).
  - (1) Initial notification for existing affected sources must be submitted no later than December 4, 2004.
  - (2) Initial notification for new and reconstructed affected sources must be submitted as required by 40 CFR 63.9(b).
  - (3) For the purpose of this Subpart, a Title V or Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b), provided the same information is contained in the permit application as required by 40 CFR 63.9(b) and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA to implement and enforce this Subpart.
  - (4) If using a permit application in lieu of an initial notification in accordance with 40 CFR 63.3400(b)(3), the permit application must be submitted by the same due date specified for the initial notification.
- (c) Notification of compliance status. Pursuant to 40 CFR 63.3400(e), the Permittee must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: GE Plastics Mt. Vernon, Inc.  
Source Address: 1 Lexan Lane, Mt. Vernon, Indiana 47620  
Mailing Address: 1 Lexan Lane, Mt. Vernon, Indiana 47620  
Source Modification No.: 129-20673-00002

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

Please check what document is being certified:

- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Date:

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

### PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: GE Plastics Mt. Vernon, Inc.  
Source Address: 1 Lexan Lane, Mt. Vernon, Indiana 47620  
Mailing Address: 1 Lexan Lane, Mt. Vernon, Indiana 47620  
Source Modification No.: 129-20673-00002

**This form consists of 2 pages**

**Page 1 of 2**

<p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
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If any of the following are not applicable, mark N/A

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

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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**

**Technical Support Document (TSD) for  
a Part 70 Minor Source Modification**

**Source Background and Description**

Source Name:	GE Plastics Mt. Vernon, Inc.
Source Location:	1 Lexan Lane, Mt. Vernon, Indiana 47620
County:	Posey
SIC Code:	2821
Operation Permit No.:	129-6794-00002
Operation Permit Issuance Date:	Pending
Minor Source Modification No.:	129-20673-00002
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from GE Plastics Mt. Vernon, Inc. relating to the construction and operation of the following emission units to be located in Structured Products Area:

- (a) Two (2) plastic film web coating lines, identified as C7A and C7B, to be constructed in 2005, and exhausting through S/V #10-358 and S/V #10-359, respectively.
- (b) One (1) plastic film web coating line, identified as C8, to be constructed in 2006, and exhausting through S/V #10-360.

Note: The maximum process rate and the maximum coating usage information of the units included in this source modification is treated as confidential information.

**History**

GE Plastics Mt. Vernon, Inc. is an existing plastics manufacturing plant and is an existing PSD major source. On February 1, 2005, the Permittee submitted an application to the OAQ requesting to construct and operate three (3) coating lines which deliver coating to a plastic web via roll-coating. No particulate emissions are emitted from these roll-coating operations. The coating will be cured by UV light. The Permittee applied for a Part 70 Permit (T129-6794-00002) on October 6, 1996 and this Part 70 permit has not yet been issued.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Minor Source Modification 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 application for the purposes of this review was received on February 1, 2005. Additional information was received on February 11, 2005.

**Emission Calculations**

The information contained in the emissions calculations for this modification is confidential.

**Potential To Emit of Modification**

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.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	--
PM10	--
SO <sub>2</sub>	--
VOC	33.5
CO	--
NO <sub>x</sub>	--

HAPs	Potential To Emit (tons/year)
Acrylic Acid	5.56
Hydroquinone	1.03
TOTAL	6.59

**Justification for Modification**

This modification is being performed through a Part 70 Minor Source Modification pursuant to 326 IAC 2-7-10.5(d)(5) as a RACT rule, 326 IAC 8-2-5 is the most stringent applicable requirement to this modification.

**County Attainment Status**

The source is located in Posey County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

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

326 IAC 2-2.

- (b) Posey County has been classified as attainment or unclassifiable in Indiana for all other criteria. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
 Since this type of operation is in one of the 28 listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability.

**Source Status**

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

Pollutant	Emissions (tons/year)
PM	119
PM10	119
SO <sub>2</sub>	3,823
VOC	437
CO	1,919
NO <sub>x</sub>	2,677

- (a) This existing source is a major stationary source because one or more regulated pollutants are emitted at a rate of 100 tons per year or more, and it is in one of the 28 listed source categories.
- (b) These emissions are based upon the 2001 emission inventory information of GE Plastics Mt. Vernon, Inc. (Plant ID #129-00002).

**Potential to Emit of Modification After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Three (3) Plastic Film Coating Lines	-	-	-	33.5	-	-	6.59
PSD Significant Thresholds	25	15	40	40	100	40	NA

This modification to an existing major stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The proposed coating lines will not apply coatings to any business machines. Therefore, the New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR 60.720 - 60.726, Subpart TTT) are not applicable to this modification.
- (c) The proposed coating lines will not be used to coat flexible vinyl or urethane products. Therefore, the New Source Performance Standards for Flexible Vinyl and Urethane Coating and Printing (40 CFR 60.580 - 60.585, Subpart FFF) are not applicable to this modification.
- (d) The proposed three (3) new plastic film coating lines are considered web coating lines as defined in 40 CFR 63.3310 and this existing source is a major source for HAP. Therefore, the proposed plastic film coating lines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paper and Other Web Coating (40 CFR 63.3280 - 63.3420, Subpart JJJJ).

Pursuant to 40 CFR 63.3300, the affected source subject to this subpart is the collection of all web coating lines at this source. The Permittee stated that the existing web coating lines C6, C45, S4, S5, and S16 are subject to this NESHAP and the installation of the proposed three (3) new coating lines will not cost more than 50% of the cost of rebuilding all the web coating lines. Therefore, this modification project is not considered a reconstruction of the existing affected source as defined in 40 CFR 63.2. Therefore, the proposed three (3) new coating lines at this source shall comply with the emission standards for existing sources under this NESHAP.

Pursuant to 40 CFR 63.3330(a), the compliance date for the existing affected sources is December 5, 2005. Since the source's Part 70 permit is currently being drafted and is expected to be public noticed before December 5, 2005, the specific emission and compliance options of this Subpart as chosen by the Permittee will be included in the Part 70 permit. Therefore, the specific emission limitations and compliance requirements of this NESHAP will not be included in this source modification.

- (e) Since the proposed coating lines are subject to the NESHAP for Paper and Other Web Coating (40 CFR 63, Subpart JJJJ), these coating operations are exempt from the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products (40 CFR 63.4480 - 63.4581, Subpart PPPP), pursuant to 40 CFR 63.4481(c)(14).
- (f) This modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:
  - (1) With the potential to emit before controls equal to or greater than the major source threshold;
  - (2) That is subject to an emission limitation or standard; and
  - (3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64 (Compliance Assurance Monitoring) are not applicable to this modification.

## **State Rule Applicability – Plastic Film Coating Lines C7A, C7B, and C8**

### **326 IAC 2-2 (PSD)**

This existing plastic manufacturing plant is a PSD major source. The potential to emit VOC of this modification is less than 40 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable. Any change or modification which may increase the VOC input to the coating lines C7A, C7B, and C8 to greater than 40 tons per year must be approved by the Office of Air Quality before any such change may occur.

### **326 IAC 2-4.1 (New Source Toxic Control)**

The potential to emit HAPs of this modification is less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this modification.

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

The proposed plastic film coating lines constitute web coating operations of plastic films. Therefore, the proposed web coating operations are subject to 326 IAC 8-2-5. Pursuant to 326 IAC 8-2-5(b), the Permittee shall not discharge into the atmosphere any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating applicator for a plastic coating line.

According to the Material Safety Data Sheet submitted by the Permittee, the coating which will be used in the proposed coating lines is in compliance with the VOC content requirement in 326 IAC 8-2-5.

### **326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)**

Since the requirements of 326 IAC 8-2-5 apply to the proposed plastic film coating lines C7A, C7B, and C8, the requirements of 326 IAC 8-1-6 (BACT) are not applicable to these coating lines.

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

Since the proposed coating lines will apply coating using roll coating, there are no particulate emissions from these coating lines and the proposed coating lines are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(6).

## **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 Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no specifically applicable compliance monitoring requirements for this modification.

## **Conclusion**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 129-20673-00002.