



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: October 6, 2005
RE: Gaska Tape, Inc. / 039-20898-00077
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 permit modification 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) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit 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 impracticable 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.



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

Mr. Greg Szabo
Gaska Tape, Inc.
1810 West Lusher Avenue
Elkhart, Indiana 46517

October 6, 2005

Re: 039-20898-00077
First Significant Permit Modification to
Part 70 No.: T 039-6352-00077

Dear Mr. Szabo:

Gaska Tape, Inc., was issued a Part 70 permit on March 27, 2002 for a paper and foamed plastic adhesive tape manufacturing plant. A letter requesting changes to this permit was received on March 8, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of incorporating a single HAP and combined HAPs emission limitations to avoid the applicability of 326 IAC 20 and 40 CFR Part 63.3280, Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings, which has a compliance date of December 5, 2005.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification 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 Aida De Guzman OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original Signed By:
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments/ APD

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector – Paul Karkiewicz
Compliance Data Section
Administrative and Development
Jack Smith Jr. – Gaska Tape, Inc.
Elizabeth Hill – Bruce Carter Associates, L.L.C.



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

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Gaska Tape
1810 West Lusher Avenue
Elkhart, Indiana 46517

(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.

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.

Table with 2 columns and 5 rows containing permit details: Operation Permit No., Issuance/Expiration Dates, Administrative Amendments, Modification No., and Issuance Date.

- C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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)]
- C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

D.1 FACILITY OPERATION CONDITIONS - Process Lines 26

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

- D.1.1 New Source Performance Standard [326 IAC 12] [40 CFR 60.440, Subpart RR]
- D.1.2 VOC [326 IAC 8-2-5]
- D.1.3 Hazardous Air Pollutant (HAPs) Emission Limitations

Compliance Determination Requirements

- D.1.4 VOC Emissions and HAPs Emissions
- D.1.5 Volatile Organic Compounds (VOC)

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

- D.1.6 Record Keeping Requirements
- D.1.7 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Insignificant Activity 29

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

- D.2.1 VOC [326 IAC 8-3-2 and 326 IAC 8-3-5]
- D.2.2 Particulate Matter (PM) [326 IAC 6-3]

Certification	32
Emergency Occurrence Report	33-34
Quarterly Report	34a
Quarterly Report	35
Quarterly Report	36
Quarterly Report	37
Semiannual Report	38
Quarterly Deviation and Compliance Monitoring Report	39-40

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 foamed plastic adhesive tape manufacturing plant.

Responsible Official:	Jack Smith, Jr., President of Gaska Tape, Inc.
Source Address:	1810 West Lusher Ave., Elkhart, Indiana 46517
Mailing Address:	1810 West Lusher Ave., Elkhart, Indiana 46517
SIC Code:	3086
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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) One (1) Plastisol Processing Line, identified as PPL#1, using knife-edge and thin roll adhesive coating, with a maximum capacity of 4131 pounds of PVC foam per hour to substrate, with a regenerative thermal oxidizer (RTO) for control of VOC, exhausting at seven (7) stacks, identified as Stacks 1, 2, 3, 4, 5, 6, and the RTO at Stack 22. (Constructed in 1965; Reconstructed in 1985)
- (b) One (1) Plastisol Processing Line, identified as PPL#2, using knife-edge and thin roll adhesive coating, with a maximum capacity of 4131 pounds of PVC foam per hour to substrate, with a regenerative thermal oxidizer (RTO) for control of VOC, exhausting at five (5) stacks, identified as Stacks 7, 8, 9, 10, and the RTO at Stack 22. (Constructed in 1995)
- (c) One (1) Custom Lamination Line, identified as CLL-1, using thin roll coating application, with a maximum capacity of 23.5 gallons of coating per hour, exhausting to one (1) stack, identified as Stack LL-01. (Constructed in 1999)
- (d) One (1) Silicone/Adhesive Line, using thin roll-coating with a maximum capacity of 3867 pounds of paper coated per hour, with a regenerative thermal oxidizer (RTO) for control of VOC, exhausting at two (2) stacks, identified as Stacks 11, and the RTO at Stack 22. (Constructed in 1995)
- (e) One (1) Prototype Line, using knife-edge coating (this facility also has the potential to use thin roll coating), with a maximum capacity of 415 pounds of Plastisol per hour, 39 pounds of adhesives per hour or 32 pounds of paper coated per hour, with an electrostatic precipitator (ESP) (which is used to collect oil mist), exhausting at two (2) stacks, identified as Stacks 14, and the ESP at Stack 15. (Constructed in 1994)

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (326 IAC 8-3-2 and 326 IAC 8-3-5)
- (b) Combustion source flame safety purging on startup.
- (c) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100^{EF}) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20^{EC} (68^{EF}); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Infrared cure equipment.
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (f) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (g) Replacement or repair of electrostatic precipitators, bags in bag houses and filters in other air filtration equipment.
- (h) 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.
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (j) Other categories with emissions below insignificant thresholds:
 - (1) Two (2) air compressors
 - (2) One (1) soda blaster, utilizing baking soda with dust baghouse with 99.7% efficiency (326 IAC 6-3)
 - (3) Thirteen (13) foam cutters
 - (4) Twelve (12) Cool-Ray Vac radiant heat systems
 - (5) One (1) natural gas-fired dryer oven, OVCST-1 with four (4) burners, identified as BRN-1 through BRN-4. Burner, BRN-1 has a heat input capacity of 850,000 British Thermal Units per hour (Btu/hr). Burners, BRN-2 through BRN-4 have heat input capacities of 500,000 Btu/hr each.
 - (6) Maintenance and repair welding.(326 IAC 6-3)
 - (7) Mixing, utilizing dust collection. (326 IAC 6-3)

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).

emitting less than 45 Mg of VOC per consecutive 12 month period).

- (c) Any change or modification which may increase the CLL-1 VOC input usage to the coating process to 45 megagram (Mg) per 12 month period must be approved by the Office of Air Quality (OAQ) before such change may occur, and shall be subject to 326 IAC 20, 40 CFR Part 60.440, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations). (Note: 1.1Mg is equivalent to 1 ton)
- (d) The operation of the regenerative thermal oxidizer controlling VOC emissions is not necessary to limit emissions so that the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR), Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, do not apply.

D.1.2 VOC [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line. The Plastisol Processing Line #1, Plastisol Processing Line #2, Custom Laminating Line, Silicone/Adhesive Line and the Prototype Line are all subject to this rule and demonstrate compliance through volume weighted averaging.

D.1.3 Hazardous Air Pollutant Emission Limitations

- (a) The sourcewide single Hazardous Air Pollutant (HAP) input usage shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit shall make the source an area source and 326 IAC 20 and 40 CFR Part 63.3280, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings not applicable.
- (b) The sourcewide combined Hazardous Air Pollutant (HAP) input usage shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit shall make the source an area source and 326 IAC 20 and 40 CFR Part 63.3280, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings not applicable.

Compliance Determination Requirements

D.1.4 VOC Emissions and HAPs Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) consecutive month period.
- (b) Compliance with condition D.1.3 shall be demonstrated within 30 days of the end of each month. This shall be based on any total single HAP and any combined HAPs emitted for the previous month, and adding it to previous 11 months total single HAP and combined HAPs emitted so as to arrive at single HAP and combined HAPs emissions for the most recent 12 consecutive month period.

The single HAP and combined HAPs emissions for a month can be arrived at using the following equation for HAP usage:

$$\begin{aligned} \text{HAP emitted} &= (\text{uncontrolled HAP input}); \text{ or} \\ &= [(\text{material usage, tons/month}) \times (\text{weight percent HAP})] \end{aligned}$$

D.1.5 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-1-2(a)(7), volume weighted averaging of the coatings is used to determine compliance with the limitation set in condition D.1.2 for the silicone/adhesive line shall be determined by the following equation:

$$A = [3 (C \times U) / 3 U]$$

Where: A is the volume weighted average in pounds VOC per gallon
C is the VOC content of the coating in pounds VOC per gallon
and U is the usage rate of the coating in gallons per unit, hour, day or other unit of time.

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 Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include inventory records and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.3.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include inventory records and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The solvent usage for each month;
 - (4) The total single and combined HAP usage for each month; and
 - (5) The weight of single HAP and combined HAPs emitted for each month
- (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 and semi-annual summary of the information to document compliance with Conditions D.1.1 and D.1.3 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

Gaska Tape, Inc.

1st Significant Permit Modification No.: 039-20898-00077

Page 28 of 40

Elkhart, Indiana
Permit Reviewer: Holly M. Stockrahm

Modified by: Aida De Guzman

OP No. T039-6352-00077

2-7-1(34).

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

Part 70 Quarterly Report

Name: Gaska Tape, Inc.
 Address: 1810 West Lusher Ave., Elkhart, Indiana 46517
 Address: 1810 West Lusher Ave., Elkhart, Indiana 46517
 Permit No.: T039-6352-00077
 Facility: Sourcewide
 Parameter: HAPs
 Limits: The sourcewide single Hazardous Air Pollutant (HAP) input usage shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

The sourcewide combined Hazardous Air Pollutant (HAP) input usage shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

QUARTER: _____ YEAR: _____

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

- 9 No deviation occurred in this quarter.
- 9 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

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Gaska Tape, Inc.
Source Location:	1810 West Lusher Avenue, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3086
Operation Permit No.:	T039- 6352-00077
Operation Permit Issuance Date:	March 27, 2002
Significant Permit Modification:	039-20898-00077
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a permit modification application from Gaska Tape, Inc. relating to the request to limit the source's hazardous air pollutant (HAP) emissions below the major source's thresholds before a control device, in order to avoid the applicability of 40 CFR Part 63.3280, Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings.

History

On March 8, 2005, Gaska Tape, Inc., submitted a permit modification application to the OAQ. Gaska Tape, Inc., was issued a Part 70 permit on March 27, 2002. The source is currently a major source for hazardous air pollutants, which is subject to 40 CFR Part 63.3280, Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings. The source is required to comply with this NESHAP by December 5, 2005.

Although, the source has a Regenerative Thermal Oxidizer (RTO) controlling the two plastisol lines and adhesive line, which are the main sources of VOC and HAPs, this RTO was installed **voluntarily** and not to comply with any applicable requirements. Being this reason for its installation, there has no enforceable conditions in the Part 70 permit for this RTO, but instead the source limited their VOC input usage to avoid the applicability of the NSPS, 326 IAC 12 and 40 CFR Part 60.440, Subpart RR for Pressure Sensitive Tape and Label Surface Coating.

The source also chose to limit their HAP usage in order to stay below 10 tons per year for single HAP and below 25 tons per year for combined HAPs and not be subject to the NESHAP, 40 CFR Part 63.3280, Subpart JJJJ; instead of using the RTO to stay below the HAPs major levels.

Existing Approvals

The source was issued a Part 70 Operating Permit (T039- 6352-00077) on March 27, 2002. The source has since received the following:

- (a) First Administrative Amendment No.: 039-18956-00077, issued on July 21, 2004; and

- (b) Review Request for Section 112(j) Applicability No.: 039-16327-00077, issued on February 4, 2004.

Recommendation

The staff recommends to the Commissioner that the Significant Permit 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 March 8, 2005.

Justification for the Modification

The source, a paper and foamed plastic adhesive tape manufacturing plant, is an existing major source for HAPs. Therefore, it is subject to 40 CFR Part 63.3280, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings. Since the source will be limited to less than 10 tons per year for any single HAP emissions and less than 25 tons per year for any combination of HAPs to avoid this rule, the permit change will involve significant change as it will include monitoring, record keeping and reporting of HAP usages. Therefore, this modification will be subject to 326 IAC 2-7-12(d), significant permit modification.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM2.5	Attainment
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x are considered when evaluating the rule applicability relating to ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset.
- (b) Elkhart County has been classified as attainment for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD).

Federal Rule Applicability

- (a) The change will not affect any other federal rules already determined to be applicable or not applicable to the source.
- (b) 326 IAC 20 and 40 CFR Part 63.3280, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings.-

The source, a paper and foamed plastic adhesive tape manufacturing plant, is subject to 40 CFR Part 63.3280, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings, since it is an existing major source for HAPs. However, the source requested to be limited to less than 10 tons per year for any single HAP emissions and less than 25 tons per year for any combination of HAPs to avoid this rule, which has a compliance date of December 5, 2005.

State Rule Applicability

The change will not affect any state rules already determined to be applicable or not applicable to the source

Changes to the Part 70 Permit

The Part 70 will be modified to incorporate the following changes (additions are **bolded** and deletions are ~~struck through~~ for emphasis):

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 foamed plastic adhesive tape manufacturing plant.

Responsible Official:	Jack Smith, Jr., President of Gaska Tape, Inc.
Source Address:	1810 West Lusher Ave., Elkhart, Indiana 46517
Mailing Address:	1810 West Lusher Ave., Elkhart, Indiana 46517
SIC Code:	3086
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

Section A.2 item (e) will be revised to state the Electrostatic Precipitator as collecting "oil mist" which is considered particulate, instead of its current description in the Part 70 permit as "not used for control of PM".

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:

- (e) One (1) Prototype Line, using knife-edge coating (this facility also has the potential to use thin roll coating), with a maximum capacity of 415 pounds of Plastisol per hour, 39 pounds of adhesives per hour or 32 pounds of paper coated per hour, with an electrostatic precipitator (ESP) (which is ~~not for control of PM~~ **used to collect oil mist**), exhausting at

two (2) stacks, identified as Stacks 14, and the ESP at Stack 15. (Constructed in 1994)

Emissions Limitations and Standards

D.1.1 through D.1.2 no changes

The following condition will be added and be numbered D.1.3. Subsequent conditions will be renumbered accordingly:

D.1.3 Hazardous Air Pollutant Emission Limitations

- (a) **The sourcewide single Hazardous Air Pollutant (HAP) input usage shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit shall make the source an area source and 326 IAC 20 and 40 CFR Part 63.3280, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings not applicable.**

- (b) **The sourcewide combined Hazardous Air Pollutant (HAP) input usage shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit shall make the source an area source and 326 IAC 20 and 40 CFR Part 63.3280, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coatings not applicable.**

Compliance Determination Requirements

D.1.3.4 VOC Emissions and HAPs Emissions

- (a) **Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) consecutive month period.**

- (b) **Compliance with condition D.1.3 shall be demonstrated within 30 days of the end of each month. This shall be based on any total single HAP and any combined HAPs emitted for the previous month, and adding it to previous 11 months total single HAP and combined HAPs emitted so as to arrive at single HAP and combined HAPs emissions for the most recent 12 consecutive month period. The single HAP and combined HAPs emissions for a month can be arrived at using the following equation for HAP usage:**

$$\begin{aligned} \text{HAP emitted} &= (\text{uncontrolled HAP input}); \text{ or} \\ &= [(\text{material usage, tons/month}) \times (\text{weight percent HAP})] \end{aligned}$$

D.1.4.5 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-1-2(a)(7), volume weighted averaging of the coatings is used to determine compliance with the limitation set in condition D.1.2 for the silicone/adhesive line shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon
C is the VOC content of the coating in pounds VOC per gallon
and U is the usage rate of the coating in gallons per unit, hour, day or other unit of time.

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

D.1.5 6 Reporting Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include inventory records and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.3.**
- (1) The amount and HAP content of each coating material and solvent used. Records shall include inventory records and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (2) A log of the dates of use;**
 - (3) The solvent usage for each month;**
 - (4) The total single and combined HAP usage for each month; and**
 - (5) The weight of single HAP and combined HAPs emitted for each month**
- (f c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 7 Reporting Requirements

A quarterly and semi-annual summary of the information to document compliance with Conditions D.1.1 **and** D.1.3 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).

The following reporting form will be added for reporting HAPs usage:

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

Part 70 Quarterly Report

Name: Gaska Tape, Inc.
Address: 1810 West Lusher Ave., Elkhart, Indiana 46517
Address: 1810 West Lusher Ave., Elkhart, Indiana 46517
Permit No.: T039-6352-00077
Facility: Sourcewide
Parameter: HAPs
Limits: The sourcewide single Hazardous Air Pollutant (HAP) input usage shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

The sourcewide combined Hazardous Air Pollutant (HAP) input usage shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

QUARTER: _____ **YEAR:** _____

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

- 9 No deviation occurred in this quarter.
- 9 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

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.

The compliance monitoring requirements applicable to this source are as follows:

Conclusion

The operation of this paper and foamed plastic adhesive tape manufacturing plant shall be subject to the conditions of the attached **Significant Permit Modification 039-20898-00077**.