Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
CITY OF HAMMOND
RONALD L. NOVAK
Director

PART 70 OPERATING PERMIT RENEWAL

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR POLLUTION CONTROL DIVISION

Silgan Containers Manufacturing Corporation
2501 165th Street
Hammond, Indiana 46320

(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.: T089-21146-00202	
Issued by: Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 2, 2007
Issued by: Original signed by: Ronald L. Novak, Director Hammond Department of Environmental Management	Expiration Date: October 2, 2012

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Hammond. IN 46320
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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM). 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, metal coil coating for can manufacturers operation, that coats steel and aluminum coils.

Source Address:	2501 – 165th Street, Hammond, IN 46320
Mailing Address:	(same)
General Source Phone Number:	(219) 845-1500
SIC Code:	3479 & 3411 – Metal Coil Coating for Can Manufacturers, Coated Steel and Aluminum Coils
County Location:	Lake
Source Location Status:	Attainment/Unclassifiable for PM10, SO_2, CO, NO_2 and Lead, Nonattainment for PM2.5 and 8-hour ozone,
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 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) Coil Coating Line, identified as Oven and oxidizer, constructed in 1957, with a maximum line speed of 600 ft/min and maximum heat input rate of 44 MMBtu/hr and 10.4 MMBtu/hr, respectively (total combined capacity 54.4 MMBtu/hr), natural gas-fired only. The application method is roll coating. The VOC emissions from this line are controlled by one (1) regenerative thermal oxidizer, constructed in 2007, which exhausts to stack, identified as OX1. This line also includes ten (10) mixing tanks, identified as MT 1 – MT 10, constructed in 1984, each with a maximum capacity of 290 gallons.

(b) Seven (7) Indoor Vertical, Fixed-Roof Storage Tanks, identified as Tanks 1 – 7, Tanks 1 – 5 each with a maximum capacity of 12,000 gallons, constructed in 1970, and Tanks 6 & 7 each with a maximum capacity of 10,000 gallons, constructed in 1995, venting to TV 1 – TV 7, respectively. These seven (7) tanks are used to store various solvents and coatings.

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

(1) Space heaters, process heaters, or boilers using the following fuels.
(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

-Three (3) Rapid Engineering Spaceheaters, identified as AMU 1, AMU 2, and AMU 3, constructed in 1995, each rated at 9.65 MMBtu/hr and natural gas-fired only.

-Two (2) Dock Heaters No. 1 and No. 2, identified as Dock 1 and Dock 2, constructed in 1969, each rated at 0.75 MMBtu/hr and natural gas-fired only.

(2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(4) Paved and unpaved roads and parking lots with public access.

(5) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(6) Emergency generators as follows:
Diesel generators not exceeding 1600 horsepower.

(7) Grinding and machining operations combined with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(8) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(9) Other categories with emissions below insignificant thresholds not specifically regulated:
(a) One (1) Roll Grinder emitting less than one (1) lb/day of particulate.
(b) One (1) Emergency Diesel Generator emitting less than 1 lb/day of products of combustion.
(c) One (1) Gasoline Generator/Welder emitting less than 1 lb/day of products of combustion.
(d) One (1) Roll Lathe with Dust Collector emitting less than 1 lb/day of particulate.
(e) One (1) Radial Arm Saw with Cyclone and Bag Filter emitting less than 1 lb/day of particulate.
(f) Two (2) Closed Top Degreasers (20 and 55 gallon capacity) emitting less than 1 lb/day of volatile organic compounds. [326 IAC 8-3-2 & 326 IAC 8-3-5]

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T089-21146-00202, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.

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

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

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

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

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

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

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by 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. One (1) certification may cover multiple forms in one (1) submittal.

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and HDEM 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865, or

HDEM
Telephone Number: 219-853-6306
Facsimile Number: 219-853-6343

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T089-21146-00202 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

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

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of twenty percent (20%) 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.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6.8-10-3]

The Permittee shall be in violation of 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner

at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

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

C.8 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within sixty (60) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within sixty (60) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

in writing, prior to the end of the initial sixty (60) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on January 9, 2001.

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

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity,

the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:

(1) starting in 2007 and every three (3) years thereafter, and

(2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

(b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

C.18 Annual Emission Inventory [Hammond Ordinance No. 7102]

The Permittee shall submit an annual emission inventory containing production information for each permitted unit. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. The emission inventory must be received by July 1 of each year. A valid emission statement satisfying the requirements of Condition C.17 shall be considered an acceptable emission inventory. This is a local requirement only. The emission inventory does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

(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 or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM 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 "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) affecting an existing emissions unit other than a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) 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/or 326 IAC 2-3-1(mm)(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 existing 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

(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 and HDEM on or before the date it is due.

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

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

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

One (1) Coil Coating Line, identified as Oven and oxidizer, constructed in 1957, with a maximum line speed of 600 ft/min and maximum heat input rate of 44 MMBtu/hr and 10.4 MMBtu/hr, respectively (total combined capacity 54.4 MMBtu/hr), natural gas-fired only. The application method is roll coating. The VOC emissions from this line are controlled by one (1) regenerative thermal oxidizer, constructed in 2007, which exhausts to stack, identified as OX1. This line also includes ten (10) mixing tanks, identified as MT 1 – MT 10, constructed in 1984, each with a maximum capacity of 290 gallons.

(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 Matter less than 10 microns (PM10) Limitations [326 IAC 6.8-2-31]

Pursuant to 326 IAC 6.8-2-31 (formerly 326 IAC 6-1-10.1) (Lake County PM10 emission requirements),

(a) the PM10 emissions from the Coil Coater shall be limited to 0.007 lbs/MMBtu and 0.290 lbs/hr as specifically listed in 326 IAC 6.8-2-31; and

(b) the PM10 emissions from the Stacks serving the incinerator shall be limited to 0.007 lbs/MMBtu and 0.310 lbs/hr as specifically listed in 326 IAC 6.8-2-31.

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-4(b)]

Pursuant to 326 IAC 8-2-4(b) (Coil coating operations), the VOC emissions from the Coil Coating Line shall be limited to 2.6 pounds per gallon (excluding water) as specifically listed in 326 IAC 8-2-4(b).

D.1.3 Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties [326 IAC 8-7]

Pursuant to 326 IAC 8-7-2 (Applicability), the Coil Coating Line, which has the potential to emit a total equal to or greater than ten (10) tons per year of VOCs in Lake County is subject to 326 IAC 8-7 Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties. Affected facilities must implement an emissions reduction measure as stated in 326 IAC 8-7-3. Pursuant to 326 IAC 8-7-3(1), Silgan has installed an add-on control system that achieves an overall control efficiency of ninety-eight percent (98%) as an emissions reduction measure. Operation of the regenerative thermal oxidizer at 98% overall control efficiency is required at all times in order for the Coil Coating Line to comply with this rule.

D.1.4 Hazardous Air Pollutants (HAP) Minor Limitations

Pursuant to MPM 089-19655-00202, issued on June 22, 2005:

(a) For the Coil Coating Line, identified as Oven and oxidizer, the single Hazardous Air Pollutant (HAP) emissions shall be limited to less than 9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) For the Coil Coating Line, identified as Oven and oxidizer, the combined Hazardous Air Pollutants (HAPs) emissions shall be limited to less than 24 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The regenerative thermal oxidizer known as OX1 shall maintain a minimum overall HAP control efficiency of ninety-eight percent (98%).

(d) Compliance with these limits in combination with the potential HAPs emissions from the insignificant activities will limit the source wide single HAP and total HAPs to less than 10 and 25 tons per year, respectively, and will render 326 IAC 20, (40 CFR 63, Subpart SSSS Surface Coating of Metal Coil) not applicable to this source.

D.1.5 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 this facility and its control device.

Compliance Determination Requirements

D.1.6 Thermal Oxidizer Operation

In order to comply with Conditions D.1.2, D.1.3 and D.1.4, the regenerative thermal oxidizer shall be in operation whenever the Coil Coating Line is in operation.

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC and HAPs usage and content limitations contained in Conditions D.1.2 and D.1.4 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, and HDEM reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2(b)] [326 IAC 8-7-3(3)]

Compliance with the VOC content and emission limitation shall be determined pursuant to 326 IAC 8-1-2(b) using formulation data supplied by the coating manufacturer.

$E = L/(1 – L/D)$

Where: L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating less water;
D = Density of VOC in coating in pounds per gallon of VOC (lbs/gal) as applied;
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

The emission limit in 326 IAC 8-2-4 is 2.6 lbs VOC per gal less water. The standard coating density used in formulas in the can industry is 7.36 lbs/gal as cited in 326 IAC 8-1-2. Therefore, the VOC limitation in terms of Lbs VOC/gal solids is:

lbs/VOC per gal of solids = 2.6/(1 – 2.6/7.36) = 4.02 lbs VOC/ gal solids

The equivalency emission limit is 4.02 pounds of VOC per gallon of coating solids as applied.

The emissions from the Coil Coater with Oven are controlled by one (1) regenerative thermal oxidizer. The overall rated control efficiency is 98%. This control efficiency is used to find the compliant limit of a coating's VOC content per gallon of coating solids.

(1-Overall Control Efficiency) X = emission limit of 4.02 lbs VOC per gal of solids (as applied)

where X = compliant coating limit in lbs VOC per gal of solids
(1 – 0.98) X = 4.02
X = 201 lbs VOC per gal of coating solids (as applied)

Coating Density (as applied) = Coating Density (as supplied) + (Dilution Solvent Density X Dilution Ratio) / (1+ Dilution Ratio)

lbs solids per gal of coating (as applied) = Coating Density (as supplied) * [Weight % Solids (as supplied) / 100] / (1 + Dilution Ratio)

Weight % Solids in coating (as applied) = lbs solids per gal coating / Coating Density (as applied) X 100

Weight % Solvent in coating (as applied) = 100 – Weight % Solids (as applied)

Volume % Solids in Coating (as applied) = Vol % Solids (as supplied) / (1 + Dilution Ratio)

lbs VOC/gal less water (as applied) = Density (as applied) X [Weight % Solvent (as applied) / 100]

lbs VOC/gal solids (as applied) = lbs VOC/gal less water (as applied) / [Volume % Solids (as applied) / 100]

The lbs VOC per gal of solids "as applied" is then compared to the limit for coil coating, considering the overall control efficiency, 201 lbs VOC per gal of coating solids (as applied). If lbs VOC per gal of solids "as applied" is less than this value, the coating "as applied" is compliant. If it is larger than this value, the coating "as applied" is not compliant and should not be used.

D.1.9 Hazardous Air Pollutant (HAP) Calculations

In order to demonstrate compliance with the HAP emission limitations in Condition D.1.4, the Permittee shall determine the single and combined HAPs emissions for each month for Coil Coating Line, identified as Oven and oxidizer, using the following methodology:

HAP emissions = [(HAP usage) x (1.0 - 0.98)]

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.2, D.1.3, and D.1.4, within one hundred eighty (180) days after start up of the regenerative thermal oxidizer, the Permittee shall perform overall control efficiency testing of the regenerative thermal oxidizer for VOC and HAP, and determine the 3-hour average temperature, fan amperage or duct pressure using methods approved by the Commissioner. HAP testing shall be conducted for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM and HDEM. This testing shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

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

D.1.11 Thermal Oxidizer Temperature [40 CFR 64]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. Continuous means measuring temperature at an interval of once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the regenerative thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in conditions D.1.2 and D.1.4, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the regenerative thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.12 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.2.

Silgan Containers Manufacturing Corporation shall be required to document compliance with the applicable (VOC) emission limitation based on a daily weighted average of all coatings applied. These records shall include the following:

(1) Date of use

(2) Coating identification (inside and outside material)

(3) Process operating rate (GALS/MLFT for each coating)

(4) Coating usage (application rate in weight /area, total gallons of coating used, total gallons of solids used)

(5) Coating information (as supplied and as applied of the coating density, % by weight & volume of organic volatiles, % by weight & volume of solids, lbs-VOC/gal less water as applied, lbs-VOC/gal of solids, dilution solvent used, and the dilution solvent ratio)

(6) Control equipment efficiency

(7) VOC emissions calculations (total lbs-VOC before controls and total lbs-VOC after controls)

(8) VOC emissions allowable

Sample calculations must also be included for the above items.

(b) To document compliance with Condition D.1.2, the Permittee shall be required to keep monthly records of all cleaning solvents used.

(c) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. These records shall be complete and sufficient to establish compliance with the twelve (12) month rolling total single and combination HAP emission limits established in Condition D.1.4. These records shall include the following:

(1) The HAP content of each coating as applied;

(2) The monthly amount of each coating used; and

(3) The 12-month rolling total of the input of each individual hazardous air pollutant and total of hazardous air pollutants.

(d) To document compliance with Condition D.1.2, the Permittee shall be required to submit to the Department a formal request to use any new coatings not previously applied for prior to use. This request must be submitted at least seven (7) days in advance of use. The Permittee shall ensure compliance with 326 IAC 8-2-4 and provide the Department with any MSDS.

(e) To document compliance with Condition D.1.11, the Permittee shall maintain continuous records (on a three-hour average) of thermal oxidizer temperature.

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

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the addresses listed in Section C – General Reporting Requirements, of this permit, using a company computer-generated form and the reporting forms located at the end of this permit, or its equivalent, respectively, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Seven (7) Indoor Vertical, Fixed-Roof Storage Tanks, identified as Tanks 1-7, Tanks 1 – 5 each with a maximum capacity of 12,000 gallons, constructed in 1970, and Tanks 6 & 7 each with a maximum capacity of 10,000 gallons, constructed in 1995, venting to TV 1 – TV 7, respectively. These seven (7) tanks are used to store various solvents and coatings.

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

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

D.2.1 Record Keeping and Reporting Requirements

To document compliance with 326 IAC 8-9-6(a), the owner or operator of each vessel subject to 326 IAC 8-9-6 shall keep all records required by subsection (b) for the life of the vessel. In accordance with 326 IAC 8-9-6(b), records of each vessel including the vessel identification number, dimensions, capacity, and a description of the emission control equipment shall be submitted to the address(es) listed in Section C – General Reporting Requirements, of this permit, upon request.

SECTION D.3 FACILITY OPERATION CONDITIONS – INSIGNIFICANT ACTIVITIES

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

Three (3) Rapid Engineering Spaceheaters, identified as AMU 1, AMU 2 and AMU 3, constructed in 1995, each rated at 9.65 MMBtu/hr and natural gas-fired only.

Two (2) Dock Heaters No. 1 and No. 2, identified as Dock 1 and Dock 2, constructed in 1969, each rated at 0.75 MMBtu/hr and natural gas-fired only.

(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.3.1 Particulate Matter (PM), Sulfur Dioxide (SO2), Nitrogen Oxide (NOx), Volatile Organic Compound (VOC), and Carbon Monoxide (CO) [Hammond Air Quality Control Ordinance No. 3522 (as amended)]

That emissions from the combustion of natural gas are governed by the Hammond Air Quality Control Ordinance No. 3522 (as amended) for the following pollutants: Particulate Matter (PM), Sulfur Dioxide (SO2), Nitrogen Oxide (NOx), Volatile Organic Compounds (VOC), and Carbon Monoxide (CO).

SECTION D.4 FACILITY OPERATION CONDITIONS – INSIGNIFICANT ACTIVITY

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

Two (2) Closed Top Degreasers (one (1) 20 gallon capacity citrus-based, remotely stored and one (1) 55 gallon capacity solvent-based, not remotely stored).

(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.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties and which have potential emissions of one hundred (100) tons per year or greater of VOC, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or

six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility existing as of July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: **Silgan Containers Manufacturing Corporation**
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Mailing Address: (same)
Part 70 Permit No.: **T089-21146-00202**

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR POLLUTION CONTROL DIVISION

5925 Calumet Avenue
Hammond, Indiana 46320
Phone: 219-853-6306
Fax: 219-853-6343

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	**Silgan Containers Manufacturing Corporation**
Source Address:	2501 – 165th Street, Hammond, Indiana 46320
Mailing Address:	(same)
Part 70 Permit No.:	**T089-21146-00202**

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

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

- The Permittee must notify the Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for IDEM Compliance Section) and (219-853-6306, for HDEM); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967, IDEM and 219-853-6343, HDEM), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
Hammond Department of Environmental Management

Hazardous Air Pollutants (HAPs)

Source Name: **Silgan Containers Manufacturing Corporation**
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Part 70 Permit No.: T089-21146-00202
Facility: Coil Coating Line and Oxidizer
Limit: **Nine (9) tons per twelve (12) consecutive month period to be determined each month as a twelve (12) month rolling total.**
The Oxidizer shall have a minimum control efficiency of 98%.

Reporting Quarter: _____ Year: _____ HAP: _____

Month	Single HAP Input This Month	Single HAP Input Previous 11 Months	Single HAP Input 12 Month Total

Control Efficiency determined during most recent stack test_____ (98% or greater).

This form is optional. An equivalent form subject to approval by IDEM-OAQ or HDEM may be used.

_ No deviation occurred in this month.

_ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
Hammond Department of Environmental Management

Hazardous Air Pollutants (HAPs)

Source Name: **Silgan Containers Manufacturing Corporation**
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Part 70 Permit No.: T089-21146-00202
Facility: Coil Coating Line and Oxidizer
Limit: **Twenty-four (24) tons per twelve (12) consecutive month period to be determined each month as a twelve (12) month rolling total.**
The Oxidizer shall have a minimum control efficiency of 98%.

Reporting Quarter: _____ Year: _____

Month	Total HAPs Input This Month	Total HAPs Input Previous 11 Months	Total HAPs Input 12 Month Total

Control Efficiency determined during most recent stack test_____ (98% or greater).

This form is optional. An equivalent form subject to approval by IDEM-OAQ or HDEM may be used.

_ No deviation occurred in this month.

_ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: **Silgan Containers Manufacturing Corporation**
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Mailing Address: (same)
Part 70 Permit No.: **T089-21146-00202**

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

and

Hammond Department of Environmental Management

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

Source Name:	Silgan Containers Manufacturing Corporation
Source Location:	2501 165th Street, Hammond, Indiana 46320
County:	Lake
SIC Code:	3479 & 3411 – Metal Coil Coating for Can Manufacturers, Coated Steel and Aluminum Coils
Operation Permit No.:	**T089-21146-00202**
Permit Reviewer:	Debra Malone, HDEM

On July 4, 2007, the Hammond Department of Environmental Management (HDEM) had a notice published in the Times, Hammond, Indiana, stating that Silgan Containers Manufacturing Corporation had applied for a Part 70 Operating Permit Renewal to operate a metal coil coating for can manufacturing operation. The notice also stated that HDEM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The HDEM prefers that the Technical Support Document (TSD) reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the HDEM has decided to make the following revisions to the TSD and permit (bolded language has been added, the language with a line through it has been deleted).

Technical Support Document

1. On page 4 of 17 of the Technical Support Document, under County Attainment Status, the explanation of why IDEM and HDEM are considering the severe ozone nonattainment permitting requirements to still apply to sources in Lake and Porter Counties has been added due to the following:

   On December 22, 2006, the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air Quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous

one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

Changes made to the Technical Support Document are as follows:

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Attainment
PM2.5	Nonattainment
SO_2	Attainment
NO_2	Unclassifiable/Attainment
8-hour Ozone	Moderate Nonattainment
CO	Unclassifiable/Attainment
Lead	Attainment

(a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's gudiance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability – Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

(1) On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air Quality Standard for ozone. *South Coast Air Quality Mgmt. Dist.v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties

including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability for the source section.

(2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

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

(c) Lake County has been classified as attainment or unclassifiable in Indiana for particulates less than ten (10) microns in diameter (PM10), sulfur dioxides (SO_2), nitrogen oxides (NO_x), carbon monoxide (CO), and Lead (Pb). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

~~(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.~~

(**de**) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Also affected by these changes are the following areas:

Page 5 of 17 of the Technical Support Document, under Unrestricted Potential Emissions, (a) has been modified as follows:

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than ~~100~~ **25** tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Page 7 of 17 of the Technical Support Document, under Potential to Emit After Issuance, the Major Source Threshold and (b) have been modified as follows:

Major Source Threshold	250	250	250	~~100~~ **25**	250	250	negligible	10 single 25 combined

(b) This existing stationary source is major for Emission Offset for ozone because the emissions of the nonattainment pollutant, VOC, are greater than ~~one hundred (>100)~~ **twenty-five (>25)** tons per year.

Page 10 of 17 of the Technical Support Document, under State Rule Applicability – Entire Source, 326 IAC 2-3 (Emission Offset), has been modified as follows:

326 IAC 2-3 (Emission Offset)

This source, built in 1957, is an existing major stationary source for the purposes of Emission Offset because it has the potential to emit VOCs at a rate of ~~100~~ **25** TPY or more and it is located in Lake County. The source has not been reviewed under the requirements of 326 IAC 2-3 because it was in existence prior to the finalization of the rule and there has not been any major modifications, as defined in this rule, subject to the requirements of 326 IAC 2-3.

These changes have no effect on the permit.

2. On page 16 of 17 of the Technical Support Document, under Compliance Determination and Monitoring Requirements, the compliance determination requirement has been modified as follows:

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

   1. Within one hundred eighty (180) days after start up of the regenerative thermal oxidizer, the Permittee shall perform ~~inlet and outlet VOC and HAP~~ **overall control efficiency** testing of the regenerative thermal oxidizer **for VOC and HAP**, **and determine the** ~~establish~~ 3-hour average temperature**,** ~~and~~ fan amperage or duct pressure ~~for the regenerative thermal oxidizer~~ using methods approved by the Commissioner~~,~~**.** ~~for the~~ HAP **testing shall be conducted for the HAP** used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM and HDEM. This testing shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

<u>Part 70 Operating Permit Renewal</u>

1. On page 28 of 41 of the Part 70 Operating Permit Renewal, Condition D.1.10 Testing Requirements has been modified as follows:

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.2, D.1.3, and D.1.4, within one hundred eighty (180) days after start up of the regenerative thermal oxidizer, the Permittee shall perform ~~inlet and outlet VOC and HAP~~ **overall control efficiency** testing of the regenerative thermal oxidizer **for VOC and HAP**, **and determine the** ~~establish~~ 3-hour average temperature**,** ~~and~~ fan amperage or duct pressure ~~for the regenerative thermal oxidizer~~ using methods approved by the Commissioner~~,~~. ~~for the~~ HAP **testing shall be conducted for the HAP** used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM and HDEM. This testing shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

Indiana Department of Environmental Management
Office of Air Quality
and
Hammond Department of Environmental Management
-Air Pollution Control Division-

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

Source Background and Description

Source Name:	Silgan Containers Manufacturing Corporation
Source Location:	2501 - 165th Street, Hammond, Indiana 46320
County:	Lake
SIC Code:	3411 & 3479 – Metal Coil Coating for Can Manufacturers, Coated Steel and Aluminum Coils
Permit Renewal No.:	T089-21146-00202
Permit Reviewer:	Debra Malone, HDEM

The Hammond Department of Environmental Management (HDEM) has reviewed a Part 70 Operating Permit Renewal application from Silgan Containers Manufacturing Corporation relating to the operation of a Metal Coil Coating for Can Manufacturers Plant.

History

On April 26, 2005, Silgan Containers Manufacturing Corporation submitted applications to the Hammond Department of Environmental Management (HDEM) and the Office of Air Quality (OAQ) requesting to renew its operating permit. Silgan Containers Manufacturing Corporation was issued a Part 70 Operating Permit on February 5, 2001.

Permitted Emission Units and Pollution Control Equipment

(1) One (1) Coil Coating Line, identified as Oven and oxidizer, constructed in 1957, with a maximum line speed of 600 ft/min and maximum heat input rate of 44 MMBtu/hr and 10.4 MMBtu/hr, respectively (total combined capacity 54.4 MMBtu/hr), natural gas-fired only. The application method is roll coating. The VOC emissions from this line are controlled by one (1) regenerative thermal oxidizer, constructed in 2007, which exhausts to stack, identified as OX1. This line also includes ten (10) mixing tanks, identified as MT1 – MT10, constructed in 1984, each with a maximum capacity of 290 gallons.

(2) Seven (7) Indoor Vertical, Fixed-Roof Storage Tanks, identified as Tanks 1 – 7, Tanks 1 – 5 each with a maximum capacity of 12,000 gallons, constructed in 1970, and Tanks 6 & 7 each with a maximum capacity of 10,000 gallons, constructed in 1995, venting to TV 1 – TV 7, respectively. These seven (7) tanks are used to store various solvents and coatings.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

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

Insignificant Activities

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

(1) Space heaters, process heaters, or boilers using the following fuels.
   (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

   -Three (3) Rapid Engineering Spaceheaters, identified as AMU 1, AMU 2, and AMU 3, constructed in 1996, each rated at 9.65 MMBtu/hr and natural gas-fired only.

   -Two (2) Dock Heaters No. 1 and No. 2, identified as Dock 1 and Dock 2, constructed in 1969, each rated at 0.75 MMBtu/hr and natural gas-fired only.

(2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(4) Paved and unpaved roads and parking lots with public access.

(5) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(6) Emergency generators as follows:
   Diesel generators not exceeding 1600 horsepower.

(7) Grinding and machining operations combined with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(8) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(9) Other categories with emissions below insignificant thresholds:
   (a) One (1) Roll Grinder emitting less than one (1) lb/day of particulate.
   (b) One (1) Emergency Diesel Generator emitting less than 1 lb/day of products of combustion.
   (c) One (1) Gasoline Generator/Welder emitting less than 1 lb/day of products of combustion.
   (d) One (1) Roll Lathe with Dust Collector emitting less than 1 lb/day of particulate.
   (e) One (1) Radial Arm Saw with Cyclone and Bag Filter emitting less than 1 lb/day of particulate.
   (f) Two (2) Closed Top Degreasers (20 and 55 gallon capacity) emitting less than 1 lb/day of volatile organic compounds. [326 IAC 8-3-2 & 326 IAC 8-3-5]

Existing Approvals

Since the issuance of the Part 70 Operating Permit (T089-6900-00202) on February 5, 2001, the source has constructed or has been operating under the following previous approvals as well:

(a) AA 089-19540-00202, issued on July 2, 2004; and

(b) Minor Permit Modification issued on June 22, 2005.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
OX1	Regenerative Thermal Oxidizer	50	5.5	93,230	672

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 - 4).

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

The calculations for the Seven (7) Indoor Vertical, Fixed-Roof Storage Tanks submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided as Appendix B & C of this document (pages 5 – 6).

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Attainment
PM2.5	Nonattainment
SO_2	Attainment
NO_2	Unclassifiable/Attainment
8-hour Ozone	Moderate Nonattainment
CO	Unclassifiable/Attainment
Lead	Attainment

(a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's gudiance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability – Entire Source section.

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

(c) Lake County has been classified as attainment or unclassifiable in Indiana for particulates less than ten (10) microns in diameter (PM10), sulfur dioxides (SO_2), nitrogen oxides (NO_x), carbon monoxide (CO), and Lead (Pb). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	2.82
PM-10	2.82
SO_2	0.22
VOC	7,151.96
CO	31.22
NO_x	37.16

HAPs	tons/year
Benzene	0.004
Cumene	0.28
Ethylbenzene	3.23
Formaldehyde	0.07
Isophorone	2.50
Methyl isobutyl ketone	2.97
Naphthalene	0.15
Toluene	2.74
Xylenes (isomers & mixtures)	18.73
Total	30.67

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.56
PM-10	0.56
SO_2	0.04
VOC	12.01
CO	6.21
NO_x	7.39

HAPs	Actual Emissions (tons/year)
Benzene	0.0002
Cumene	0.07
Ethylbenzene	0.06
Formaldehyde	0.01
Hexane	0.13
Isophorone	0.04
Methyl isobutyl ketone	0.32
Naphthalene	0.01
Toluene	0.03
Xylenes (isomers & mixtures)	0.40

Part 70 Permit Conditions

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

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

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

Potential to Emit After Issuance

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

	Potential to Emit (tons/year)							
Process/emission unit	**PM**	**PM-10**	**SO_2**	**VOC**	**CO**	**NO_X**	**Lead**	**HAPs**
Coil Coater	--	--	--	89.35	--	--	--	--
Stack serving incinerator	1.81	1.81	0.14	1.31	20.01	23.83	negligible	--
Coil Coating Solvent Addition	--	--	--	39.10	--	--	--	--
Coil Coating Cleanup	--	--	--	14.54	--	--	--	--
Seven (7) Indoor, Vertical, Fixed-Roof Storage Tanks	--	--	--	0.27	--	--	--	--
Three (3) Rapid Engineering Spaceheaters	0.96	0.96	0.08	0.70	10.65	12.68	negligible	--
Dock Heaters No. 1 and No. 2	negligible	negligible	negligible	negligible	0.55	0.66	--	--
Total	**2.82**	**2.82**	**0.22**	**145.27**	**31.21**	**37.17**	**negligible**	**< 10 single < 25 combined**
Major Source Threshold	250	250	250	100	250	250	negligible	10 single 25 combined

(a) This existing stationary source is not major for PSD because the emissions of each attainment pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) This existing stationary source is major for Emission Offset for ozone because the emissions of the nonattainment pollutant, VOC, are greater than one hundred (>100) tons per year.

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

Federal Rule Applicability

The following federal rules are applicable to the source:

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Coil Coating Line/VOC	RTO	Y	7,151.96	145.04	100	Y	Y
Coil Coating Line/HAP emissions	RTO	Y	30.67	<10/25	10/25	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the Coil Coating Line for VOC and HAPs. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(1) Indoor Vertical, Fixed-Roof Storage Tanks 1 - 5 are not subject to the following requirements of the New Source Performance Standard 326 IAC 12 because they were constructed prior to June 11, 1973:

(A) 40 CFR 60.110, Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978;

(B) 40 CFR 60.110a, Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984; or

(C) 40 CFR 60.110b, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

(2) Indoor Vertical, Fixed-Roof Storage Tanks 6 & 7 and Mixing Tanks (MT1 – MT10) are not subject to the requirements of the New Source Performance Standard 326 IAC 12, (40 CFR 60.110b, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984).

Indoor Vertical, Fixed-Roof Storage Tanks 6 & 7 constructed in 1995 do not meet the applicability level of 40 m^3 (10,567 gallons) pursuant to 60.110b(a).

Mixing Tanks (MT1 – MT10) constructed in 1984 also do not meet the applicability level of 40 m^3 (10,567 gallons) pursuant to 60.110b(a).

(3) This facility is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.50, Subpart E – Standards of Performance for Incinerators) because it does not have a solid waste incinerator.

(4) This facility is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460, Subpart TT – Standards of Performance for Metal Coil Surface Coating) because the affected facility, the Coil Coating Line, by definition has not been constructed, modified, or reconstructed after January 5, 1981.

(5) This facility is not subject to the requirements of the New Source Performance Standard 326 IAC 12, (40 CFR 60.490, Subpart WW – Standards of Performance for the Beverage Can Surface Coating Industry) because the affected facility, the Coil Coating Line is not one of the affected facilities to which Subpart WW applies. Also, by definition the Coil Coating Line has not been constructed, modified, or reconstructed after November 26, 1980.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) included in this permit.

(1) This facility is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 20, (40 CFR 63.460(a), Subpart T – National Emission Standards for Halogenated Solvent Cleaning) because the two (2) Closed Top Degreasers (20 and 55 gallon capacity) do not use any halogenated HAP solvents.

(2) This facility is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 20, (40 CFR 63, Subpart EEE National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors) because the facility does not combust hazardous waste.

(3) This facility is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 20, (40 CFR 63, Subpart SSSS Surface Coating of Metal Coil) because MPM 089-19655-00202, issued on June 22, 2005, made this source an area source. The following limitations make 40 CFR 63, Subpart SSSS, not applicable:

(a) For the Coil Coating Line, identified as Oven and oxidizer, the single Hazardous Air Pollutant (HAP) emissions shall be limited to less than 9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) For the Coil Coating Line, identified as Oven and oxidizer, the combined Hazardous Air Pollutants (HAPs) emissions shall be limited to less than 24 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The regenerative thermal oxidizer known as OX1 shall maintain a minimum overall HAP control efficiency of ninety-eight percent (98%).

(d) The HAP emissions shall be calculated by the following equation:

HAP emitted = [(HAP usage) x (1-0.98)]

Compliance with these limits in combination with the potential HAPs emissions from the insignificant activities will limit the source wide single HAP and total HAPs to less than 10 and 25 tons per year, respectively, and will render 326 IAC 20, (40 CFR 63, Subpart SSSS Surface Coating of Metal Coil) not applicable to this source.

(4) This facility is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 20, (40 CFR 63, Subpart DDDDD Industrial, Commercial, & Institutional Boilers and Process Heaters) because the source shall limit HAP emissions below ten (10) tons per year for a single HAP and twenty-five (25) tons per year for a combination of HAPs with the existing federally enforceable conditions in the Part 70 permit.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on January 9, 2001. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This existing source, built in 1957, located in Lake County is not a major stationary source for the purposes of PSD because no attainment regulated pollutant is emitted at a rate of 250 TPY or more, and it is not one of the 28 listed source categories.

326 IAC 2-3 (Emission Offset)

This source, built in 1957, is an existing major stationary source for the purposes of Emission Offset because it has the potential to emit VOCs at a rate of 100 TPY or more and it is located in Lake County. The source has not been reviewed under the requirements of 326 IAC 2-3 because it was in existence prior to the finalization of the rule and there has not been any major modifications, as defined in this rule, subject to the requirements of 326 IAC 2-3.

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

Surface Coating of Metal Coil was constructed before 1997, the effective date of this rule. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years thereafter. This source which is located in Lake County also has the potential to emit greater than or equal to 25 tons of VOC; therefore, an emission statement covering the previous calendar year must be submitted by July 1 of any year that the source is not already required to submit a statement if the source emits VOC into the ambient air at levels equal to or greater than 25 tons per year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6.8-1-1 (Particulate Matter; Nonattainment Area Limitations – Applicability)

Pursuant to 326 IAC 6.8-1-1(a)(1) (Particulate; Nonattainment Area Limitations – Applicability), this rule is applicable to this source because it is located in Lake County and facilities are specifically listed in section 15 of this rule and therefore shall comply with the requirements of 326 IAC 6.8-2-31 Lake County PM10 emission requirements for Silgan Containers Manufacturing.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 does not apply because no sources of VOC listed in this rule were constructed between October 7, 1974 and prior to January 1, 1980 and all other VOC sources existing as of January 1, 1980 are limited by other rules in this article (326 IAC 8).

State Rule Applicability – Individual Facilities

326 IAC 4-2 Incinerators

326 IAC 4-2 establishes standards for the use of incinerators that emit regulated pollutants. 326 IAC 4-2 Incinerators does not apply to this source because the rule applies to solid waste incinerators which this source does not have.

326 IAC 6.8-1-2(a) (Particulate emission limitations)

Pursuant to 326 IAC 6.8-1-1(a)(2), facilities located in Lake County shall comply with the limitations in section 2 of this rule, if the source or facility is not specifically listed in 326 IAC 6.8-2 through 326 IAC 6.8-11, but has (A) the potential to emit one hundred (100) tons or more; or (B) actual emissions of ten (10) tons or more; of particulate matter per year shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)). The radial

arm saw, grinding and welding operations are subject to this rule because the source has the potential to emit one hundred (100) tons or more of particulate matter per year.

326 IAC 6.8-2-31 (Lake County PM10 emission requirements – Silgan Containers Manufacturing)

Pursuant to 326 IAC 6.8-2-31 (formerly 326 IAC 6-1-10.1) (Lake County PM10 emission requirements), the PM10 emissions from the Coil Coater shall be limited to 0.007 lbs/MMBtu and 0.290 lbs/hr as specifically listed in 326 IAC 6.8-2-31.

Pursuant to 326 IAC 6.8-2-31 (formerly 326 IAC 6-1-10.1) (Lake County PM10 emission requirements), the PM10 emissions from the Stacks serving the incinerator shall be limited to 0.007 lbs/MMBtu and 0.310 lbs/hr as specifically listed in 326 IAC 6.8-2-31.

326 IAC 7-1.1-1 (Applicability - sulfur dioxide emission limitations)

All emission units associated with the Metal Coil Coating for Can Manufacturers Plant have the potential to emit less than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, 326 IAC 7-4.1-1 (Lake County sulfur dioxide emission limitations) does not apply.

326 IAC 8-2-4 (Coil coating operations)

Pursuant to 326 IAC 8-2-1 (Applicability), facilities existing as of January 1, 1980, of the types described in sections 2 through 8 of this rule, located in Lake County and which are located at sources which have potential emissions of one hundred (100) tons or greater per year of VOC shall comply with this rule. Pursuant to 326 IAC 8-2-4(b) (Coil coating operations), the VOC emissions from the Coil Coating Line shall be limited to 2.6 pounds per gallon (excluding water) as specifically listed in 326 IAC 8-2-4(b). Operation of the thermal oxidizer is required for the Coil Coating Line to comply with this rule.

Use of a non-compliant coating also requires that compliance be determined according to equivalency emission standards, expressed as pounds of VOC per gallon of coating solids, allowed under the applicable emission limitation contained in 326 IAC 8-1-2 (Compliance methods).

326 IAC 8-1-2 [326 IAC 8-7-3(3)] (Volatile Organic Compounds (VOCs)-Compliance methods)

Compliance with the VOC content and emission limitation shall be determined pursuant to 326 IAC 8-1-2(b) using formulation data supplied by the coating manufacturer.

$$E = L/(1 - L/D)$$

Where: L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating less water;
D = Density of VOC in coating in pounds per gallon of VOC (lbs/gal) as applied;
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

The emission limit in 326 IAC 8-2-4 is 2.6 lbs VOC per gal less water. The standard coating density used in formulas in the can industry is 7.36 lbs/gal as cited in 326 IAC 8-1-2. Therefore, the VOC limitation in terms of Lbs VOC/gal solids is:

lbs/VOC per gal of solids = 2.6/(1 – 2.6/7.36) = 4.02 lbs VOC/ gal solids

The equivalency emission limit is 4.02 pounds of VOC per gallon of coating solids as applied.

The emissions from the Coil Coater with Oven are controlled by one (1) regenerative thermal oxidizer. The overall rated control efficiency is 98%. This control efficiency is used to find the compliant limit of a coating's VOC content per gallon of coating solids.

(1-Overall Control Efficiency) X = emission limit of 4.02 lbs VOC per gal of solids (as applied)

where X = compliant coating limit in lbs VOC per gal of solids
(1 – 0.98) X = 4.02
X = 201 lbs VOC per gal of coating solids (as applied)

Coating Density (as applied) = Coating Density (as supplied) + (Dilution Solvent Density X Dilution Ratio) / (1+ Dilution Ratio)

lbs solids per gal of coating (as applied) = Coating Density (as supplied) * [Weight % Solids (as supplied) / 100] / (1 + Dilution Ratio)

Weight % Solids in coating (as applied) = lbs solids per gal coating / Coating Density (as applied) X 100

Weight % Solvent in coating (as applied) = 100 – Weight % Solids (as applied)

Volume % Solids in Coating (as applied) = Vol % Solids (as supplied) / (1 + Dilution Ratio)

lbs VOC/gal less water (as applied) = Density (as applied) X [Weight % Solvent (as applied) / 100]

lbs VOC/gal solids (as applied) = lbs VOC/gal less water (as applied) / [Volume % Solids (as applied) / 100]

The lbs VOC per gal of solids "as applied" is then compared to the limit for coil coating, considering the overall control efficiency, 201 lbs VOC per gal of coating solids (as applied). If lbs VOC per gal of solids "as applied" is less than this value, the coating "as applied" is compliant. If it is larger than this value, the coating "as applied" is not compliant and should not be used.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1(a) (Applicability), existing facilities as of January 1, 1980, performing organic solvent degreasing operations located in Lake County and located at a source which has potential emissions of 100 tons or greater per year of VOC are subject to the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations).

The two (2) Closed Top Degreasers (one (1) 20 gallon capacity citrus-based, remotely stored and one (1) 55 gallon capacity solvent-based, not remotely stored) are subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation).

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties and which have potential emissions of one hundred (100) tons per year or greater of VOC, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-1(b) (Applicability), facilities existing as of July 1, 1990 performing organic solvent degreasing operations in Lake County using cold cleaner degreasers without remote solvent reservoirs are subject to the requirements of 326 IAC 8-3-5 (Cold cleaner degreaser operation and control).

The one (1) Closed Top Degreaser (one (1) 55 gallon capacity solvent-based (XA solvent), not remotely stored) is subject to the requirements of 326 IAC 8-3-5 (Cold cleaner degreaser operation and control).

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility existing as of July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Pursuant to 326 IAC 8-7-2 (Applicability), coating facilities which emit or have the potential to emit a total equal to or greater than ten (10) tons per year of VOCs in Lake County shall be subject to the requirements of 326 IAC 8-7.

Pursuant to 326 IAC 8-7-3(3) (Emission limits), Silgan has achieved an alternative overall emission reduction with the application of reasonably available control technology (RACT) that has been determined as reasonably available by the U.S. EPA and IDEM. Pursuant to 326 IAC 8-7-3(1), Silgan has also installed an add-on control system that achieves an overall control efficiency of ninety-eight percent (98%) as an emissions reduction measure. Operation of the regenerative thermal oxidizer at 98% overall control efficiency is required at all times in order for the Coil Coating Line to comply with this rule.

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

Pursuant to 326 IAC 8-9-6 (Record keeping and reporting requirements) stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons are subject to the reporting and record keeping provisions of section 6(a) and 6(b) of this rule and are exempt from all other provisions of this rule. The seven (7) Indoor Vertical, Fixed-Roof Storage Tanks are subject to the requirements of 326 IAC 8-9-6(b) since they each have capacities less than thirty-nine thousand (39,000) gallons.

To document compliance with 326 IAC 8-9-6(a), the owner or operator of each vessel subject to 326 IAC 8-9-6 shall keep all records required by subsection (b) for the life of the vessel. In accordance with 326 IAC 8-9-6(b), records of each vessel including the vessel identification number, dimensions, capacity, and a description of the emission control equipment shall be submitted to IDEM, OAQ and HDEM upon request.

Local Rule Applicability

Hammond Air Quality Control Ordinance No. 3522 (as amended)

Emissions from the combustion of natural gas are governed by the Hammond Air Quality Control Ordinance No. 3522 (as amended) for the following pollutants: Particulate Matter (PM), Sulfur Dioxide (SO2), Nitrogen Oxide (NOx), Volatile Organic Compound (VOC), and Carbon Monoxide (CO). This ordinance is not federally or state approved.

Annual Emission Inventory [Hammond Ordinance No. 7102}

The Permittee shall submit an annual emission inventory containing production information for each permitted unit. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. The emission inventory must be received by July 1 of each year. A valid emission statement satisfying the requirements of Condition C.17 shall be considered an acceptable emission inventory. This is a local requirement only. The emission inventory does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

1. Within one hundred eighty (180) days after start up of the regenerative thermal oxidizer, the Permittee shall perform inlet and outlet VOC and HAP testing of the regenerative thermal oxidizer, establish 3-hour average temperature and fan amperage or duct pressure for the regenerative thermal oxidizer using methods approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM and HDEM. This testing shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

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

1. The source shall ensure that a continuous monitoring system is calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. Continuous means measuring temperature at an interval of once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the regenerative thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

   The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in conditions D.1.2 and D.1.4, as approved by IDEM.

   On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the regenerative thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

   This monitoring condition is necessary to ensure compliance with 326 IAC 8-2-4 (Coil coating operations) and 40 CFR 64, Compliance Assurance Monitoring (CAM).

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on April 26, 2005.

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

Conclusion

The operation of this Metal Coil Coating for Can Manufacturers Plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. **089-21146-00202.**

Appendix A

Silgan Containers Manufacturing Corporation
2501 - 165th Street
Hammond, Indiana 46320

Permit No. T089-21146-00202
REC'D DATE: 7/26/06
CALC DATE: 7/30/06
Modified: 4/30/07

CALCULATIONS BY: Kristina Massey

NO. OF POINTS: 3

NOTES
EF: EMISSION FACTOR
CE: CONTROL EFFICIENCY
MDR: MAXIMUM DESIGN RATE
MDC: MAXIMUM DESIGN CAPACITY
Ts: STACK DISCHARGE TEMPERATURE
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

****

P1,S1; Coil Coating Line-Surface Coating

MDR (T/hr): 0.51

STACK ID (DIAM:HEIGHT): (5.5: 50)
FLOWRATE (ACFM): 93,230
Ts(°F): 672

CNTRL DEV: Regenerative Thermal Oxidizer

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 4-02-018-01			POTENTIAL EMISSIONS							ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROLS					
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)		(lbs/hr)	(TPY)
PM	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	0.0000		0	0.0000
PM10	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	0.0000		0	0.0000
SOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A		0	0.0000
NOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A		0	0.0000
VOC	2000	0.98	1,020.0000	24,480	**4,467.6000**	20.4000	89.3520	N/A		20.4000	89.3520
CO	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A		0	0.0000
LEAD	---	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A		0	0.0000

MDR: (gal/hr) X (lbs/gal) X (lbs VOC/lb coating) / (2,000 lbs/ton) = Tons of Solvent/hr

MDR based on coatings A.40.5 and O.59.5

Coating: A.40.5 rate applied 104.70 gal/hr
density = 8.52 lbs/gal
Volatiles: 72.13 wt %
Solids: 27.75 wt%

MDR: (104.70 gal/hr) X (8.52 lbs/gal) X (0.7213 lbs VOC/lb coating) / (2000 lbs/ton) = 0.3217 Tons VOC/hr

Coating: O.69.5 rate applied 60.15 gal/hr
density = 7.69 lbs/gal
Volatiles: 81.19 wt %
Solids: 18.81 wt%

MDR: (60.15 gal/hr) X (7.69 lbs/gal) X (0.8119 lbs VOC/lb coating) / (2000 lbs/ton) = 0.1878 Tons VOC/hr

Total MDR: 0.3217 Tons VOC/hr + 0.1878 Tons VOC/hr = 0.5095 Tons VOC/hr

(Segment No. 2)

****

P1,S4; Combustion MDC (mmBtu/hr): 54.4 HEAT CONTENT (Btu/cft): 1000 STACK ID (DIAM:HEIGHT): N/A

In-Process Fuel Usage MDR (mmcft/hr): 0.054 FLOWRATE (ACFM):

Control Device: None Ts(°F):

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 03-90-006-89			POTENTIAL EMISSIONS BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
POLLUTANT	EF(lbs/mmcft)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	7.6	0	0.4134	9.9226	**1.8109**	0.4134	1.8109	N/A	0.4134	1.8109
PM10	7.6	0	0.4134	9.9226	**1.8109**	0.4134	1.8109	N/A	0.6000	2.6280
SOx	0.6	0	0.0326	0.7834	**0.1430**	0.0326	0.1430	N/A	0.0326	0.1430
NOx	100	0	5.4400	130.5600	**23.8272**	5.4400	23.8272	N/A	5.4400	23.8272
VOC	5.5	0	0.2992	7.1808	**1.3105**	0.2992	1.3105	N/A	0.2992	1.3105
CO	84	0	4.5696	109.6704	**20.0148**	4.5696	20.0148	N/A	4.5696	20.0148
LEAD	0.0005	0	0.0000	0.0007	**0.0001**	0.0000	0.0001	N/A	0.0000	0.0001

*THIS POINT IS CLASSED "REGISTERED" ACCORDING TO THE POTENTIAL EMISSIONS. PM10: 326 IAC 6.8-2-31 - 0.290 lbs/hr + 0.310 lbs/hr

EF from AP-42, Table1.3-2, 1.3-4, and 1.3-B

Oven: 44 MMBtu/hr
Incinerator#1: 10.4 MMBtu/hr

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P1,S2; Coil Coating Solvent Addition MDR (T/hr): 0.223 STACK ID (DIAM:HEIGHT): (5.5: 50)

FLOWRATE (ACFM): 93,230

CNTRL DEV: Regenerative Thermal Oxidizer Ts(°F): 672

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 03-09-011-04			POTENTIAL EMISSIONS BEFORE CONTROLS			AFTER CONTROLS			ALLOWABLE	
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	0.0000	0	0.0000
PM10	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	0.0000	0	0.0000
SOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000
NOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000
VOC	2000	0.98	446.4000	10,714	**1,955.2320**	8.9280	39.1046	N/A	8.9280	39.1046
CO	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000
LEAD	---	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000

Coating: VAS6839-020 w/ XA - 70 gal/hr
density = 7.844 lbs/gal
Volatiles: 70.334 wt %; 79.577 V %
Solids: 29.666 wt %; 20.423 V %

****

P1,S3; Coil Coating Cleanup MDR (T/hr): 0.083 STACK ID (DIAM:HEIGHT): (5.5: 50)

FLOWRATE (ACFM): 93,230

CNTRL DEV: None Ts(°F): 672

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 4-90-999-99			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	0.0000	0	0.0000
PM10	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	0.0000	0	0.0000
SOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000
NOx	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000
VOC	2000	0.98	166.0000	3,984.0000	**727.0800**	3.3200	14.5416	N/A	3.3200	14.5416
CO	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000
LEAD	0	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0	0.0000

MDR based on maximum usage rate of 20 gallons per day.

DBE 5050 and X, 0.193 Tons of Solvent/hr

The 20 gallons per day is a worst case scenario since the facility reuses the solvent/coating waste the next time the coating in question is used.

P2,S1; Spaceheater Nos. 1-3 MDC (mmBtu/hr): 28.95 HEAT CONTENT (Btu/cft): 1000 STACK ID (DIAM:HEIGHT):

MDR (mmcft/hr): 0.029 FLOWRATE (ACFM):

Control Device: None Ts(°F):

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 01-05-002-06			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(lbs/mmcft)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	7.6	0	0.2200	5.2805	**0.9637**	0.2200	0.9637	N/A	0.2200	0.9637
PM10	7.6	0	0.2200	5.2805	**0.9637**	0.2200	0.9637	N/A	0.2200	0.9637
SOx	0.6	0	0.0174	0.4169	**0.0761**	0.0174	0.0761	N/A	0.0174	0.0761
NOx	100	0	2.8950	69.4800	**12.6801**	2.8950	12.6801	N/A	2.8950	12.6801
VOC	5.5	0	0.1592	3.8214	**0.6974**	0.1592	0.6974	N/A	0.1592	0.6974
CO	84	0	2.4318	58.3632	**10.6513**	2.4318	10.6513	N/A	2.4318	10.6513
LEAD	0.0005	0	0.0000	0.0003	**0.0000**	0.0000	0.0000	N/A	0.0000	0.0001

*THIS POINT IS CLASSED "REGISTERED" ACCORDING TO THE POTENTIAL EMISSIONS.

EF from AP-42, Table1.3-2, 1.3-4, and 1.3-B

P3,S1; Dock Heaters No. 1 and No. 2
(No Stack)
Control Device: None

MDC (mmBtu/hr): 1.5
MDR (mmcft/hr): 0.002

HEAT CONTENT (Btu/cft): 1000

STACK ID (DIAM:HEIGHT):
FLOWRATE (ACFM):
Ts(°F):

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 03-09-900-03			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(lbs/mmcft)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	7.6	0	0.0114	0.2736	**0.0499**	0.0114	0.0499	N/A	0.0114	0.0499
PM10	7.6	0	0.0114	0.2736	**0.0499**	0.0114	0.0499	N/A	0.0114	0.0499
SOx	0.6	0	0.0009	0.0216	**0.0039**	0.0009	0.0039	N/A	0.0009	0.0039
NOx	100	0	0.1500	3.6000	**0.6570**	0.1500	0.6570	N/A	0.1500	0.6570
VOC	5.5	0	0.0083	0.1980	**0.0361**	0.0083	0.0361	N/A	0.0083	0.0361
CO	84	0	0.1260	3.0240	**0.5519**	0.1260	0.5519	N/A	0.1260	0.5519
LEAD	---	0	0.0000	0.0000	**0.0000**	0.0000	0.0000	N/A	0.0000	0.0000

*THIS POINT IS CLASSED "REGISTERED" ACCORDING TO THE POTENTIAL EMISSIONS.
EF from AP-42, Table1.3-2, 1.3-4, and 1.3-B

PLANT TOTALS

	POTENTIAL EMISSIONS	
POLLUTANT	BEFORE CONTROLS	AFTER CONTROLS
PM	2.8245	2.8245
PM10	2.8245	2.8245
SOx	0.2230	0.2230
NOx	37.1643	37.1643
VOC	7,151.9560	145.0423
CO	31.2180	31.2180
LEAD	0.0001	0.0001

Tanks 4.0 Emissions Report

Identification

User Identification:	Tanks 1 - 5
City:	Hammond
State:	Indiana
Company:	Silgan Containers Manufacturing Corporation
Type of Tank:	Vertical Fixed Roof Tank

Tank Dimensions

Shell Height (ft):	15.00
Diameter (ft):	12.00
Liquid Height(ft):	14.00
Avg. Liquid Height (ft):	10.00
Volume (gallons):	11,844.41
Turnovers:	13.00
Net Throughput (gal/yr):	153,977.4
Is Tank Heated? (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Medium
Shell Condition:	Good
Roof Color/Shade:	Gray/Medium
Rood Condition:	Good

Roof Characteristics

Type:	Dome
Height (ft):	0.50
Radius (ft) (Dome Roof):	6.00

Breather Vent Settings

Vacuum Settings (psig):	0.00
Pressure Settings (psig):	0.50

Meteorological Data used in Emissions Calculations: Chicago, Illinois (Avg. Atmospheric Pressure = 14.38 psia)

	Losses (lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Xylene (-m)	31.98	13.53	45.51

Tanks 4.0 Emissions Report

Identification

User Identification:	Tanks 6 - 7
City:	Hammond
State:	Indiana
Company:	Silgan Containers Manufacturing Corporation
Type of Tank:	Vertical Fixed Roof Tank

Tank Dimensions

Shell Height (ft):	14.00
Diameter (ft):	12.00
Liquid Height(ft):	12.00
Avg. Liquid Height (ft):	10.00
Volume (gallons):	10,152.36
Turnovers:	14.00
Net Throughput (gal/yr):	142,133.0
Is Tank Heated? (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Medium
Shell Condition:	Good
Roof Color/Shade:	Gray/Medium
Rood Condition:	Good

Roof Characteristics

Type:	Dome
Height (ft):	0.50
Radius (ft) (Dome Roof):	6.00

Breather Vent Settings

Vacuum Settings (psig):	0.00
Pressure Settings (psig):	0.50

Meteorological Data used in Emissions Calculations: Chicago, Illinois (Avg. Atmospheric Pressure = 14.38 psia)

	Losses (lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Xylene (-m)	29.52	11.00	40.52