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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 24, 2005

RE: Royal Adhesives and Sealants, LLC / 141-21201-00146

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05

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Mr. Randy Greenley ` May 24, 2005
Royal Adhesives and Sealants, L.L.C.
2001 W. Washington Ave.
South Bend, Indiana 46628

Re: 141-21201
Fifth Administrative Amendment to
Part 70 141-9909-00146

Dear Mr. Greenley,

Royal Adhesives and Sealants, L.L.C. was issued a Part 70 permit on March 16, 2000 for the operation of a sealant and adhesive manufacturing plant. A letter requesting an amendment was received on May 02, 2005. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows.

The Permittee has requested to install one (1) 3000 gallon adhesive churn, identified as CH-29, to supplement their current production capacity. The mixing time of the adhesive blend, which this churn will handle, restricts the potential mix batches to no more than two (2) per day. The formulations produced in this CH-29 require a twelve (12) hour churn time, restricting the churns to two (2) cycles per day. The churns in this category are required to purge a total of thirty (30) minutes per batch. Based on the previous stack test performed on the representative churn at the facility, the potential emissions from CH-29 are determined to be 13.93 pounds (lbs) of VOC per hour of purge. The potential emissions from CH-29, are thus calculated to be 2.54 tons per year. Therefore, the installation of one (1) 3000 gallon adhesive churn, identified as CH-29, is an administrative amendment pursuant to 2-7-11 (a) (7).

Sections A.2 and D.2 of the Part 70 permit are administratively amended as follows:

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

The emission units and pollution control equipment descriptions in this Part 70 Permit will replace all previous emission units and pollution control equipment descriptions from previously issued permits, due to the following reasons:

Some permitted facilities were not constructed.
Some permitted/constructed facilities were eliminated.
Some not-yet-permitted/constructed facilities were included in the Part 70 application.

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

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

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

(c) Two (2) VOL storage tanks, identified as ST-10 and ST-11, each with a volume of less than 40 cubic meters but greater than 1,000 gallons, constructed in 1987, with pressure venting to the atmosphere and no emission control

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

Churn Content, ID	Stack ID	Condenser ID	Installation date	Volume (gal)
Sealant CH-7	S-7	CE-7	Nov. 96	210
Sealant CH-8	S-8	CE-8	Nov. 96	210
Sealant CH-9	S-9	CE-9	June 98	900
Sealant CH-10	S-10	CE-10	June 98	900
Sealant CH-28	S-28	CE-28	April 03	500
Sealant CH-53	S-53	CE-53	Nov. 96	500
Adhesive CH-1	S-1	CE-1	Nov. 96	330
Adhesive CH-2	S-2	CE-2	Nov. 96	330
Adhesive CH-3	S-3	CE-3	Nov. 97	55
Adhesive CH-4	S-4	CE-4	June 98	55
Adhesive CH-22	S-22	CE-22	June 98	2,000
Adhesive CH-25*	S-25	CE-25	April 99	750
Adhesive CH-26	S-26	CE-26	Nov. 97	1,500
Adhesive CH-27	S-27	CE-27	March 01	2,000
Adhesive CH-29	**S-29**	**CE-29**	**May 05**	**3,000**
Adhesive CH-54	S-54	CE-54	Nov. 96	550
Adhesive CH-55	S-55	CE-55	Nov. 96	560
Adhesive CH-56	S-56	CE-56	Nov. 97	600

* Adhesive churn CH-25 is a 750 gal. churn which replaced the previously permitted 600 gal. churn CH-25.

The sealant churns have a combined maximum production capacity of 7,003 lbs/hr, and the adhesive churns have a combined maximum production capacity of ~~9,759~~ **10,009** lbs/hr.

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

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

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

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

(i) One (1) 1,500 gallon water-based adhesive mixing churn, identified as W-400, with a maximum capacity of 560 pounds of water-based adhesive per hour, which has not yet been constructed.

(j) Dust collectors DC-1, DC-2, and DC-6 are designed to control particulate matter emissions from all of the facilities except for the VOL storage tanks ST-1 through ST-11**.**

(k) A VOL storage tank, identified as ST-12, with a volume of less than 40 cubic meters but greater than 1,000 gallons, erected in 1987 but not yet constructed/used, with pressure venting to the atmosphere and no emission control

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) Churn Content, ID	Stack ID	Condenser ID	Installation date	Volume (gal)
Sealant CH-7	S-7	CE-7	Nov. 96	210
Sealant CH-8	S-8	CE-8	Nov. 96	210
Sealant CH-9	S-9	CE-9	June 98	900
Sealant CH-10	S-10	CE-10	June 98	900
Sealant CH-28	S-28	CE-28	April 03	500
Sealant CH-53	S-53	CE-53	Nov. 96	500
Adhesive CH-1	S-1	CE-1	Nov. 96	330
Adhesive CH-2	S-2	CE-2	Nov. 96	330
Adhesive CH-3	S-3	CE-3	Nov. 97	55
Adhesive CH-4	S-4	CE-4	June 98	55
Adhesive CH-22	S-22	CE-22	June 98	2,000
Adhesive CH-25*	S-25	CE-25	April 99	750
Adhesive CH-26	S-26	CE-26	Nov. 97	1,500
Adhesive CH-27	S-27	CE-27	March 01	2,000
Adhesive CH-29	**S-29**	**CE-29**	**May 05**	**3,000**
Adhesive CH-54	S-54	CE-54	Nov. 96	550
Adhesive CH-55	S-55	CE-55	Nov. 96	560
Adhesive CH-56	S-56	CE-56	Nov. 97	600

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

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

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

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

(f) One (1) 1,500 gallon water-based adhesive mixing churn, identified as W-400, with a maximum capacity of 560 pounds of water-based adhesive per hour, which has not yet been constructed.

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

D.2.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6, solvent-based churns shall be subject to BACT should their VOC potential emissions be greater than 25 tons VOC per year. Potential emissions from each churn is less than 25 tons VOC per year when total time of nitrogen purging for each batch is 5 minutes or less for **all the** adhesive churns, **except CH-29**, and 30 minutes or less for the sealant churns **and the adhesive churn CH-29.** To ensure that potential emissions remain below 25 tons VOC/year, **all the** adhesive churns, **except CH-29,** shall be limited to a maximum total of 5 minutes of purging time per batch, and sealant churns **and the adhesive churn CH-29** shall be limited to a maximum total of 30 minutes of purging time per batch.

(b) Pursuant to 326 IAC 8-1-6, the five gal. adhesive canning line is subject to BACT due to its PTE VOC > 25 tons/year. Input VOC to the five gal. adhesive canning process shall be limited to less than less than 19,111 tons of VOC per 12 consecutive month period. This input VOC limitation will prevent VOC emissions from the five gal. adhesive canning line from being greater than 25 tons per 12 consecutive month period, thus rendering 326 IAC 8-1-6 (BACT) not applicable.

D.2.9 Solvent-based Churns

Adhesive churns and solvent-based sealant churns, each of which contain a nitrogen blanket purging system which is integral to the mixing process, have applicable compliance monitoring conditions as specified below:

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

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

These monitoring conditions are necessary to ensure that maximum total minutes for batch purging shall remain no greater than 5 minutes/ batch for **all the** adhesive churns, **except CH-29**, and 30 minutes/batch for the sealant churns **and the adhesive churn CH-29**, so that potential VOC emission will remain < 25 tons/year and BACT will not apply.

The P.O. box and the zip code on the cover page of the permit along with Commissioner and Governor's name have been revised to reflect the most current information.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Rajesh Thotakura, at (502) 326-5021 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original signed by
Nisha Sizemore, Section Chief
Permits Branch
Office of Air Quality

Attachments
RT/EVP
cc: File – St. Joseph County
U.S. EPA, Region V
St. Joseph Health Department
Air Compliance Section Inspector Rick Reynolds
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michelle Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Royal Adhesives and Sealants, L.L.C.
2001 West Washington Street
South Bend, IN 46628

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

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 and 326 IAC 2-1-3.2 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.: T141-9909-00146	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 16, 2000
1st Administrative Amendment 141-13982-00146	Issuance Date: April 11, 2001
2nd Administrative Amendment 141-15134-00146	Issuance Date: February 8, 2002
3rd Administrative Amendment 141-17361-00146	Issuance Date: April 15, 2003
4th Administrative Amendment 141-18640-00146	Issuance Date: April 14, 2004
5th Administrative Amendment 141-21201-00146	Pages Amended: 6, 28, 31 - 33
Issued by: Original signed by Nisha Sizemore, Section Chief Office of Air Quality	Issuance Date: May 24, 2005

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Certification
Emergency/Deviation Occurrence Report
Quarterly Report
Quarterly Compliance Monitoring Report

SECTION A SOURCE SUMMARY

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

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

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

Responsible Official:	James T. Elgin
Source Address:	2001 W. Washington Street, South Bend, IN 46628-2032
Mailing Address:	2001 W. Washington Street, South Bend, IN 46628-2032
Phone Number:	219 / 246 - 5000
SIC Code:	2891
County Location:	St. Joseph
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules Major Source, Section 112 of the Clean Air Act

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

The emission units and pollution control equipment descriptions in this Part 70 Permit will replace all previous emission units and pollution control equipment descriptions from previously issued permits, due to the following reasons:

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(c) Two (2) VOL storage tanks, identified as ST-10 and ST-11, each with a volume of less than 40 cubic meters but greater than 1,000 gallons, constructed in 1987, with pressure venting to the atmosphere and no emission control

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* Adhesive churn CH-25 is a 750 gal. churn which replaced the previously permitted 600 gal. churn CH-25.

The sealant churns have a combined maximum production capacity of 7,003 lbs/hr, and the adhesive churns have a combined maximum production capacity of 10,009 lbs/hr.

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

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

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

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

(i) One (1) 1,500 gallon water-based adhesive mixing churn, identified as W-400, with a maximum capacity of 560 pounds of water-based adhesive per hour, which has not yet been constructed.

(j) Dust collectors DC-1, DC-2, and DC-6 are designed to control particulate matter emissions from all of the facilities except for the VOL storage tanks ST-1 through ST-11.

(k) A VOL storage tank, identified as ST-12, with a volume of less than 40 cubic meters but greater than 1,000 gallons, erected in 1987 but not yet constructed/used, with pressure venting to the atmosphere and no emission control

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

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

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

(b) A 465 gallon water-based adhesive mixing churn, identified as W200, constructed in 1997
[326 IAC 6-3-2 (Process Operations)]

(c) A 1050 gallon water-based adhesive mixing churn, identified as W300, constructed in 1997 [326 IAC 6-3-2 (Process Operations)]

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

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted 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.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM .

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

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required

to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) 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.

B.10 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 under this permit 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, on the attached Certification Form, with each submittal.

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

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

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

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may 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.12 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 prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, 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;

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 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, except as provided in 326 IAC 2-7-16.

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

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

(g) Operations may continue during an emergency only if the following conditions are met:

(1) 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.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) 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.

(e) 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.

(f) 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).

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

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

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 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 Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(a) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 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)]

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

(1) That this permit contains a material mistake.

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

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

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

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

B.18 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

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

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

(2) If IDEM, OAQ, , upon receiving a timely and complete 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.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, **,** takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, **,** any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(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.20 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)(D)(i) 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.21 Operational Flexibility [326 IAC 2-7-20]

(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 approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (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) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(C) Any change in emissions; and

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

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).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions

related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.24 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application 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).

(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.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

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

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 14-10-4, 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) 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 that the inspector be accredited is 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

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

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

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, or other approved methods as specified in this permit.

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

C.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 June 30, 1998.

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

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

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

(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 Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. NSPS (40 CFR 60.110b through 60.117b, Subpart Kb)

(a) These emission units are subject to 40 CFR Part 60.110b through 60.117b, Subpart Kb. Pursuant to NSPS Subpart Kb, the owner/operator of Royal Adhesives and Sealants, L.L.C. is required to keep readily accessible records showing the dimensions of the storage tanks and an analysis showing the capacity of each storage tank for the life of the source.

(b) The requirement from CP 141-6333-00146, issued on November 26, 1996, Condition No. 8, requiring the owner/operator of Royal Adhesives and Sealants, L.L.C. to maintain records of the maximum true vapor pressure of VOL stored in storage tank ST-4, showing that the maximum true vapor pressure of VOL is less than 15.0 kPa, will not be incorporated into this Part 70 Permit, because 40 CFR Part 60.116b(b) does not require that records of the maximum true vapor pressure of stored VOL be maintained.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these emission units and any control devices

Compliance Determination Requirements

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

The Permittee is not required to test these emission units by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.4 Record Keeping Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

a) Churn Content, ID	Stack ID	Condenser ID	Installation date	Volume (gal)
Sealant CH-7	S-7	CE-7	Nov. 96	210
Sealant CH-8	S-8	CE-8	Nov. 96	210
Sealant CH-9	S-9	CE-9	June 98	900
Sealant CH-10	S-10	CE-10	June 98	900
Sealant CH-28	S-28	CE-28	April 03	500
Sealant CH-53	S-53	CE-53	Nov. 96	500
Adhesive CH-1	S-1	CE-1	Nov. 96	330
Adhesive CH-2	S-2	CE-2	Nov. 96	330
Adhesive CH-3	S-3	CE-3	Nov. 97	55
Adhesive CH-4	S-4	CE-4	June 98	55
Adhesive CH-22	S-22	CE-22	June 98	2,000
Adhesive CH-25	S-25	CE-25	April 99	750
Adhesive CH-26	S-26	CE-26	Nov. 97	1,500
Adhesive CH-27	S-27	CE-27	March 01	2,000
Adhesive CH-29	S-29	CE-29	May 05	3,000
Adhesive CH-54	S-54	CE-54	Nov. 96	550
Adhesive CH-55	S-55	CE-55	Nov. 96	560
Adhesive CH-56	S-56	CE-56	Nov. 97	600

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

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

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

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

f) One (1) 1,500 gallon water-based adhesive mixing churn, identified as W-400, with a maximum capacity of 560 pounds of water-based adhesive per hour, which has not yet been constructed.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the solvent-based and water-based churns shall not exceed the process weight rate limitations established by the following equation:

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

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

The following requirements from CP-141-6333-00146, issued on November 26, 1996, will not be incorporated into this Part 70 Permit:

Operation Condition No. 13: *That pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the best available control technology (BACT) for the material mixing process shall be the use of a condenser for each of the mixing churns. BACT for controlling VOC emissions from the material mixing process is based on satisfaction of the following conditions:*

(a) the maximum total volatile organic liquid (VOL) processed (for both sealant and adhesive manufacturing) shall not exceed 10.284 pounds per hour;

(b) uncontrolled VOC emissions from the mixing process are, at the maximum, 2% of the VOL processed;

(c) all condensers shall maintain a minimum of 75% VOC control efficiency; and

(d) Royal Adhesives and Sealants, L.L.C. may request an administrative amendment to the limit in Operation Condition No. 13(a) if the test described in Operation Condition No. 9 shows that:

(1) the uncontrolled VOC emissions from the mixing process are lower than 2% for the VOL processed; or

(2) VOC control efficiencies for condensers are higher than 75%.

Operation Condition No. 14: That the condensers shall be operated at all times when the material mixing process is in operation. When operating, the condenser shall be maintained within the water temperature and flow rate ranges determined in the initial compliance test to satisfy conditions (2) and (3) of Operation Condition No. 13. If the water temperature or flow rate falls outside these ranges, the company shall document the cause of the out of range reading and take immediate action to correct any problem. Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-6-5 may apply at the discretion of IDEM.

It has been determined that the PTE VOC for each adhesive and sealant mixing churn is less than 25 tons per year when total time of nitrogen purging for each batch is 5 minutes or less for adhesive churns CH-1, CH-2, CH-3, CH-4, CH-22, CH-25, CH-26, CH-27, CH-54, CH-55, and CH-56, and 30 minutes or less for sealant churns CH-9, CH-10, CH-7, CH-8, and CH-53. Therefore, BACT is not applicable for any churn at this source.

The following requirements from CP 141-9755-00146, issued Aug. 19, 1998 will not be incorporated into this Part 70 Permit:

Operation Condition No. 15: *That the five (5) condensers controlling VOC emissions from the five (5) mixing churns (ID Nos. 4, 9, 10, 22, and 27) shall be operated at all times when the five (5) mixing churns are in operation.*

(a) The Permittee shall monitor and record the cooling water temperature and flow rate of the condensers, at least once per week. The Preventive Maintenance Plan for the condenser shall contain troubleshooting contingency and corrective actions for when the cooling water temperature and flow rate readings are outside of the normal range for any one reading.

(b) The instruments used for determining the cooling water temperature and flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(c) An inspection shall be performed each calendar quarter of the condenser. Defective condenser part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of condenser part(s) replaced.

(d) In the event that a condenser's failure has been observed:

(1) The affected process will be shut down immediately until the failed unit has been replaced.

(2) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Operation Condition No. 16: *That a log of information necessary to document VOC usage in the six (6) churns (ID Nos. 4, 9,10, 22, 27, and W-400) and one (1) drum (ID No. 3) shall be maintained. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of solvents used. Also, a log of information necessary to document compliance with operation permit condition no. 15 shall be maintained. These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Quality (OAQ). Any change or modification which may increase the potential VOC emissions from any one (1) of the six (6) churns (ID Nos. 4, 9,10, 22, 27, and W-400) or one (1) drum (ID No. 3) to 25 tons per year or more must be approved by the Office of Air Quality (OAQ) before such change may occur.*

It has been determined that the PTE VOC for each adhesive and sealant mixing churn is less than 25 tons per year, because the nitrogen blanket has been determined to be integral to the churning process. Therefore, BACT is not applicable for any churn at this source. The BACT requirement to use condensers, and the associated requirement to document VOC usage, are not applicable.

D.2.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6, solvent-based churns shall be subject to BACT should their VOC potential emissions be greater than 25 tons VOC per year. Potential emissions from each churn is less than 25 tons VOC per year when total time of nitrogen purging for each batch is 5 minutes or less for all the adhesive churns, except CH-29, and 30 minutes or less for the sealant churns and the adhesive churn CH-29. To ensure that potential emissions remain below 25 tons VOC/year, all the adhesive churns, except CH-29, shall be limited to a maximum total of 5 minutes of purging time per batch, and sealant churns and adhesive churn CH-29 shall be limited to a maximum total of 30 minutes of purging time per batch.

(b) Pursuant to 326 IAC 8-1-6, the five gal. adhesive canning line is subject to BACT due to its PTE VOC > 25 tons/year. Input VOC to the five gal. adhesive canning process shall be limited to less than less than 19,111 tons of VOC per 12 consecutive month period. This input VOC limitation will prevent VOC emissions from the five gal. adhesive canning line from being greater than 25 tons per 12 consecutive month period, thus rendering 326 IAC 8-1-6 (BACT) not applicable.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these emission units and pollution control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these emission units by this permit. However, IDEM may require compliance testing when necessary to determine if the units are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition 2.1, and the VOC limit specified in Condition 2.3(b), shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Particulate Matter (PM), Volatile Organic Compounds (VOC)

The nitrogen purging systems, which provide enclosure during the churning process except during intermittent periods of nitrogen purging, and the dust collectors DC-1, DC-2, and DC-6, shall be in operation at all times the solvent-based and water-based production processes are in operation, in order to comply with the PM and VOC limits.

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.3(b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 VOC Emissions

Compliance with Condition D.2.3(b) shall be demonstrated within 30 days of the end of each month based on the emission factor and the total volatile organic compound usage to the five gallon adhesive canning line for the most recent 12 month period.

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

D.2.9 Solvent-based Churns

Adhesive churns and solvent-based sealant churns, each of which contain a nitrogen blanket purging system which is integral to the mixing process, have applicable compliance monitoring conditions as specified below:

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

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

These monitoring conditions are necessary to ensure that maximum total minutes for batch purging shall remain no greater than 5 minutes/ batch for all the adhesive churns, except CH-29, and 30 minutes/batch for the sealant churns and the adhesive churn CH-29, so that potential VOC emission will remain < 25 tons/year and BACT will not apply.

D.2.10 Dust Collectors

Dust collectors DC-1, DC-2, and DC-6 have applicable compliance monitoring conditions as specified below:

(a) The source shall take readings of the total static pressure drop across each of the dust collectors at least once per week. Unless operated under conditions for which the PMP specified otherwise, the pressure drop across each of the dust collectors shall be maintained within the range of 1.0 and 4.0 inches of water. The PMP for the dust collectors shall contain troubleshooting contingency and corrective actions for the dust collector when the pressure reading is outside of the range for any one reading.

(b) The instrument used for determining the pressure shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six months.

(c) The gauge employed to take the pressure drop across the dust collector or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within ± 2% of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

(d) An inspection of all dust collectors shall be performed each calendar quarter. Defective dust collectors shall be replaced. A record shall be kept of the results of the inspection and the number of dust collectors replaced.

(e) In the event that a dust collector's failure has been observed:

(1) The affected compartments will be shut down immediately until the failed units have been replaced.

(2) Based upon the findings of the inspection, any additional corrective actions will be devised within eight hours of discovery and will include a timetable for completion.

D.2.11 Opacity Notations

Opacity notations of all exhaust to the atmosphere from the dust collectors shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.

(a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting start up or shut down time.

(b) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.

(c) A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal and abnormal visible emissions for that specific process.

(d) The PMP for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

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

D.2.12 Record Keeping Requirements

(a) To document compliance with Condition D.2.3(a), the Permittee shall maintain the following records for the adhesive churns and the sealant churns:

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

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

(b) To document compliance with Condition D.2.10, the Permittee shall maintain weekly records of the total static pressure drop across each dust collector, and quarterly records of the results of dust collector inspections and the number of replaced dust collectors.

(c) To document compliance with Condition D.2.11, the Permittee shall maintain records of daily visible emission notations of the dust collectors' exhaust.

(d) To document compliance with Conditions D.2.3(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.3(b).

(1) The amount and VOC content of each adhesive material that is churned and solvent that is used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to adhesives and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total input of adhesive components for each month; and

(5) The weight of VOCs emitted for each compliance period.

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

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.3(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Two (2) natural gas fired boilers, identified as B-1 and B-2, each rated at 1.68 million British Thermal Units per hour (MMBtu/hr), and exhausting to stacks SB-1 and SB-2, respectively

(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 Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating):

The particulate matter (PM) emissions from the insignificant natural gas fired boilers identified as B-1 and B-2, each rated at 1.68 MMBtu per hour and constructed after Sept. 21, 1983, shall be limited to 0.6 lbs/MMBtu.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these emission units by this permit. However, IDEM may require compliance testing when necessary to determine if the units are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Royal Adhesives and Sealants, L.L.C.
Source Address: 2001 W. Washington Street, South Bend, IN 46628-2032
Mailing Address: 2001 W. Washington Street, South Bend, IN 46628-2032
Part 70 Permit No.: T141-9909-00146

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Royal Adhesives and Sealants, L.L.C.
Source Address: 2001 W. Washington Street, South Bend, IN 46628-2032
Mailing Address: 2001 W. Washington Street, South Bend, IN 46628-2032
Part 70 Permit No.: T-141-9909-0146

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

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

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

Part 70 Quarterly Report

Source Name: Royal Adhesives and Sealants, L.L.C.
Source Address: 2001 W. Washington Street, South Bend, IN 46628-2032
Mailing Address: 2001 W. Washington Street, South Bend, IN 46628-2032
Part 70 Permit No.: T141-9909-00146
Facility: Five-gallon adhesive canning line
Parameter: Input VOC
Limit: < 19,111 tons of VOC/consecutive 12 month period

YEAR: _____

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

No deviation occurred in this quarter.

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

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

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

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Royal Adhesives and Sealants, L.L.C.
Source Address: 2001 W. Washington Street, South Bend, IN 46628-2032
Mailing Address: 2001 W. Washington Street, South Bend, IN 46628-2032
Part 70 Permit No.: T141-9909-00146

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. 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.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.