



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: July 28, 2006
RE: ChromaSource, Inc. / 183-22555-00033
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**ChromaSource, Inc.
2433 S. County Road 600 East
Columbia City, Indiana 46725**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F183-22555-00033	
Issued by: Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 28, 2006 Expiration Date: July 28, 2011

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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 2-8-3(b)]

The Permittee owns and operates a stationary coated and laminated paper color sample manufacturing source.

Authorized individual:	Steven A. Scherf, Vice President of Engineering
Source Address:	2433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address:	2433 S. County Road 600 East, Columbia City, IN 46725
General Source Phone:	(260) 420-3000
SIC Code:	2672
Source Location Status:	Whitley County
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paper coating line, identified as CSI - Coater #1, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic thermal oxidizer, identified as Oxidizer #1, for VOC and HAP control, exhausting through one (1) stack (ID No. 1). CSI- Coater #1 was installed September 6, 2002;
- (b) One (1) paper coating line, identified as CSI - Coater #2, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic thermal oxidizer, identified as Oxidizer #2, for VOC and HAP control, exhausting through one (1) stack (ID No. 2). CSI- Coater #2 was installed September 6, 2002;
- (c) One (1) paper coating line, identified as CSI - Coater #3, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic thermal oxidizer, identified as Oxidizer #2, for VOC and HAP control, exhausting through one (1) stack (ID No. 2). CSI- Coater #3 was installed July 1, 2002;
- (d) One (1) catalytic thermal oxidizer, identified as Oxidizer #1, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), controlling VOC and HAP emissions from one (1) paper coating line (CSI - Coater #1) and a container cleaning operation (CSI - Container Cleaner #1), exhausting through one (1) stack (ID No. 1). Catalytic thermal oxidizer #1 was installed September 6, 2002;

- (e) One (1) catalytic thermal oxidizer, identified as Oxidizer #2, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), controlling VOC and HAP emissions from two (2) paper coating lines (CSI - Coater #2 and CSI - Coater #3), exhausting through one (1) stack (ID No. 2). Catalytic thermal oxidizer #2 was installed July 1, 2002; and
- (f) One (1) container cleaning operation, identified as CSI - Container Cleaner #1, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with a catalytic thermal oxidizer, identified as Oxidizer #1, for VOC and HAP control, exhausting through one (1) stack (ID No. 1). The container cleaning operation was installed September 6, 2002. All clean-up operations and solvent usage for the source are performed in this area.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:
 - (1) Two (2) boilers rated at 1.87 and 3.34 MMBtu/hr and constructed between October, 2001 and July, 2002; [326 IAC 6-2-4]
 - (2) Three (3) dryers, identified as Dryer #1, Dryer #2, and Dryer #3, each rated at 1.5 MMBtu/hr;
- (b) Combustion source flame safety purging on start-up;
- (c) Water based adhesives that are less than equal to 5% by volume of Volatile Organic Compounds (VOCs) excluding Hazardous Air Pollutants (HAPs);
- (d) Paved and unpaved roads and parking lots with public access;
- (e) Emergency generator as follows:
 - (1) A 30 KW, 3 phase unit, diesel generator powered by a 63 horsepower engine;
- (f) Other emergency equipment as follows:
 - (1) Stationary fire pumps;
- (g) Other activities or categories as follows:
 - (1) Paper cutting operations which cut the sheets of color samples to the proper size. These operations create small amounts of particulate matter (PM) which are swept with the paper scraps, etc. Total PM from these operations is less than the 0.551 lb/hr.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-8-1) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 183-22555-00033, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) 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. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (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 appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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 2-8-12.
- (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 describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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 material of substantial economic value.

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

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]

- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

- (d) 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.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
Indianapolis, Indiana 46204-2251
- The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

B.24 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F183-22555-00033 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

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
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within 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
Indianapolis, Indiana 46204-2251

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 Authorized Individual as defined by 326 IAC 2-1.1-1(1).

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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 2-8-4(10)]:

- (a) One (1) paper coating line, identified as CSI - Coater #1, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic thermal oxidizer, identified as Oxidizer #1, for VOC and HAP control, exhausting through one (1) stack (ID No. 1). CSI- Coater #1 was installed September 6, 2002;
- (b) One (1) paper coating line, identified as CSI - Coater #2, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic thermal oxidizer, identified as Oxidizer #2, for VOC and HAP control, exhausting through one (1) stack (ID No. 2). CSI- Coater #2 was installed September 6, 2002;
- (c) One (1) paper coating line, identified as CSI - Coater #3, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic thermal oxidizer, identified as Oxidizer #2, for VOC and HAP control, exhausting through one (1) stack (ID No. 2). CSI- Coater #3 was installed July 1, 2002;
- (d) One (1) catalytic thermal oxidizer, identified as Oxidizer #1, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), controlling VOC and HAP emissions from one (1) paper coating line (CSI - Coater #1) and a container cleaning operation (CSI - Container Cleaner #1), exhausting through one (1) stack (ID No. 1). Catalytic thermal oxidizer #1 was installed September 6, 2002;
- (e) One (1) catalytic thermal oxidizer, identified as Oxidizer #2, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), controlling VOC and HAP emissions from two (2) paper coating lines (CSI - Coater #2 and CSI - Coater #3), exhausting through one (1) stack (ID No. 2). Catalytic thermal oxidizer #2 was installed July 1, 2002; and
- (f) One (1) container cleaning operation, identified as CSI - Container Cleaner #1, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with a catalytic thermal oxidizer, identified as Oxidizer #1, for VOC and HAP control, exhausting through one (1) stack (ID No. 1). The container cleaning operation was installed September 6, 2002. All clean-up operations and solvent usage for the source are performed in this area.

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5][326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-5, the owner or operator shall not allow the discharge into the atmosphere of VOC from the three (3) paper coating lines (CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) in excess of 2.9 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

The source will use the catalytic thermal oxidizers (Oxidizer #1 and #2) to control VOC emissions in order to achieve this emission limit.

- (b) Pursuant to 326 IAC 8-1-2 (b), the three (3) paper coating lines (CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

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

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than 20.34 pounds of VOC per gallon of coating delivered to the applicator.
- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 76.45%.

D.1.2 VOC and HAP Limits [326 IAC 2-8] [326 IAC 2-4.1] [326 IAC 2-2]

- (a) (1) The total combined VOC input to the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall be limited to less than 1982 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (2) The minimum overall control efficiency of the catalytic thermal oxidizer shall be 95%. The above VOC input limit in conjunction with the use of the catalytic thermal oxidizer will limit source wide VOC emissions to less than 100 tons per year, including emissions from all insignificant activities. Therefore, the requirements of 326 IAC 2-7 do not apply.

This condition shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

- (b)
 - (1) The total combined input of any single HAP to the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall be limited to less than 200 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) The minimum overall control efficiency of the catalytic thermal oxidizer shall be 95%. The above HAP input limit in conjunction with the use of the catalytic thermal oxidizer will limit source wide emissions of any single HAP to less than 10 tons per year, including emissions from all insignificant activities. Therefore, the requirements of 326 IAC 2-7 do not apply.

This condition shall also render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

- (c)
 - (1) The combined input of total HAP to the three (3) paper coating lines (identified as CSI Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall be limited to less than 500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) The minimum overall control efficiency of the catalytic thermal oxidizer shall be 95%. The above total HAP input limit in conjunction with the use of the catalytic thermal oxidizer will limit source wide total HAP emissions to less than 25 tons per year, including emissions from all insignificant activities. Therefore, the requirements of 326 IAC 2-7 do not apply.

This condition shall also render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

- (d) The VOC capture system shall meet the following criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:
 - (1) Any natural draft opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.
 - (2) The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - (3) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters per hour (200 feet per minute). The direction of air through all NDOs shall be into the enclosure.
 - (3) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c), shall be closed during routine operation of the process.

- (4) All VOC emissions must be captured and contained for discharge through a control device.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three (3) paper coating lines and the container cleaning operation and its control device.

Compliance Determination Requirements

D.1.4 VOC and HAP Emissions

- (a) In order to comply with Condition D.1.1 and the VOC and HAP limits in Condition D.1.2, the catalytic thermal oxidizer (Oxidizer #1) shall operate at all times that the one (1) coating line (CSI - Coater #1) and the one (1) dryer (Dryer #1) and the container cleaner operation (CSI-Container Cleaner #1) are in operation.
- (b) In order to comply with Condition D.1.1 and the VOC and HAP limits in Condition D.1.2, the catalytic thermal oxidizer (Oxidizer #2) shall operate at all times that either Coater #2 and Dryer #2 are in operation or Coater #3 and Dryer #3 are in operation. Both coating lines (Coater #2 and Coater #3) shall not be operated concurrently.

D.1.5 Testing Requirements

On or before October 15, 2008, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform VOC and HAP testing (including but not limited to testing for toluene, xylene, and ethyl benzene) for the two (2) catalytic thermal oxidizers (Oxidizer #1 and Oxidizer #2) to verify that the catalytic thermal oxidizers are maintaining a minimum overall control efficiency of 95%, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.6 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Catalytic Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three hour average temperature of the thermal oxidizer is below 500°F. A three hour average temperature that is below 500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP (single and total) usage limit established in Condition D.1.2.
- (1) The VOC and HAP content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC and HAP usage for each month, including all solvent usage.
 - (4) Weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of continuous temperature (on a three hour average basis) for the catalytic thermal oxidizer and the three hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:
 - (1) Two (2) boilers rated at 1.87 and 3.34 MMBtu/hr and constructed between October, 2001 and July, 2002;

(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 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from 1.87 MMBtu/hr boiler and the 3.34 MMBtu/hr boiler shall be limited to 0.6 lb/MMBtu heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: ChromaSource, Inc.
Source Address: 2433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address: 2433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.: F183-22555-00033

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: ChromaSource, Inc.
Source Address: 2433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address: 2433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.: F183-22555-00033

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
 Source Address: 2433 S. County Road 600 East, Columbia City, IN 46725
 Mailing Address: 2433 S. County Road 600 East, Columbia City, IN 46725
 FESOP No.: F183-22555-00033
 Facility: CSI Coater #1, CSI Coater #2, CSI Coater #3 and CSI - Container Cleaner #1
 Parameter: VOC usage (tons per twelve (12) consecutive month period)
 Limit: VOC input/usage is limited to less than 1982 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	VOC	VOC	VOC
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: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
 Source Address: 2433 S. County Road 600 East, Columbia City, IN 46725
 Mailing Address: 2433 S. County Road 600 East, Columbia City, IN 46725
 FESOP No.: F183-22555-00033
 Facility: CSI Coater #1, CSI Coater #2, CSI Coater #3 and CSI - Container Cleaner #1
 Parameter: Single HAP usage (tons per twelve (12) consecutive month period)
 Limit: Single HAP input/usage is limited to less than 200 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____ HAP: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	Single HAP	Single HAP	Single HAP
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: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
 Source Address: 2433 S. County Road 600 East, Columbia City, IN 46725
 Mailing Address: 2433 S. County Road 600 East, Columbia City, IN 46725
 FESOP No.: F183-22555-00033
 Facility: CSI Coater #1, CSI Coater #2, CSI Coater #3 and CSI - Container Cleaner #1
 Parameter: Total HAP usage (tons per twelve (12) consecutive month period)
 Limit: Total HAP input/usage is limited to less than 500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	Total HAPs	Total HAPs	Total HAPs
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: _____

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ChromaSource, Inc.
Source Address: 2433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address: 2433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.: F183-22555-00033

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the
Technical Support Document (TSD) for a Federally Enforceable State Operating
Permit (FESOP) Renewal**

Source Background and Description

Source Name:	ChromaSource, Inc.
Source Location:	2433 S. County Road 600 East, Columbia City, IN 46725
County:	Whitley
SIC Code:	2672
Operation Permit No.:	183-14489-00033
Operation Permit Issuance Date:	October 19, 2001
Permit Renewal No.:	183-22555-00033
Permit Reviewer:	Tanya White/EVP

On June 15, 2006, the Office of Air Quality (OAQ) had a notice published in the Post & Mail Newspaper of Columbia City, Indiana, stating that ChromaSource, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate a stationary coating and laminating paper color sample manufacturing source. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On July 11, 2006, Steven Scherf of ChromaSource, Inc. submitted the following comments on the proposed permit:

Comment (1)

The property where the ChromaSource, Inc. plant is located in Columbia City has been separated into various plots and some were sold to other companies. As such, the street address for ChromaSource's plant has been changed from 2401 S. County Road 600 East, Columbia City, IN 46725 to 2433 S. County Road 600 East, Columbia City, IN 46725.

Response (1)

IDEM agrees that these changes are appropriate and has revised the permit making the following changes to the FESOP (additions in bold, deletions in ~~strikeout~~):

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

ChromaSource, Inc.
240433 S. County Road 600 East
Columbia City, Indiana 46725

...

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary coated and laminated paper color sample manufacturing source.

Authorized individual:	Steven A. Scherf, Vice President of Engineering
Source Address:	240433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address:	240433 S. County Road 600 East, Columbia City, IN 46725
General Source Phone:	(260) 420-3000
SIC Code:	2672
Source Location Status:	Whitley County Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name:	ChromaSource, Inc.
Source Address:	240433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address:	240433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.:	F183-22555-00033

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name:	ChromaSource, Inc.
Source Address:	240433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address:	240433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.:	F183-22555-00033

...

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
Source Address: 240433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address: 240433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.: F183-22555-00033
Facility: CSI Coater #1, CSI Coater #2, CSI Coater #3 and CSI - Container Cleaner #1
Parameter: VOC usage (tons per twelve (12) consecutive month period)
Limit: VOC input/usage is limited to less than 1982 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
Source Address: 240433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address: 240433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.: F183-22555-00033
Facility: CSI Coater #1, CSI Coater #2, CSI Coater #3 and CSI - Container Cleaner #1
Parameter: Single HAP usage (tons per twelve (12) consecutive month period)
Limit: Single HAP input/usage is limited to less than 200 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
Source Address: 240433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address: 240433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.: F183-22555-00033
Facility: CSI Coater #1, CSI Coater #2, CSI Coater #3 and CSI - Container Cleaner #1
Parameter: Total HAP usage (tons per twelve (12) consecutive month period)

...

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: ChromaSource, Inc.
Source Address: 240433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address: 240433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.: F183-22555-00033

...

Comment (2)

There are a total of three (3) surface coating lines at the plant; However, there are only two (2) catalytic thermal oxidizers to control emissions from these surface coating operations. Two (2) of the three (3) surface coating lines (Coater #2 and Coater #3) share a common inlet duct. Only one (1) of the two (2) coating lines (either Coater #2 or Coater #3) can operate at any given time. If an operator(s) attempts to operate both coating lines (Coater #2 and Coater #3) concurrently, a programmable audible alarm on the oxidizer will sound. Please revise permit to reflect this information.

Response (2)

IDEM agrees that these changes are appropriate and has revised the permit making the following changes to the FESOP (additions in bold, deletions in ~~strikeout~~):

D.1.4 VOC and HAP Emissions

- (a) In order to comply with Condition D.1.1 and the VOC and HAP limit in Condition D.1.2, the catalytic thermal oxidizer (Oxidizer #1) shall operate at all times that the one (1) coating line (CSI - Coater #1) and the one (1) dryer (Dryer #1) and the container cleaner operation (CSI-Container Cleaner #1) are in operation.
- (b) In order to comply with Condition D.1.1 and the VOC and HAP limit in Condition D.1.2, the catalytic thermal oxidizer (Oxidizer #2) shall operate at all times that ~~the two (2) coating lines (CSI - Coater #2 and CSI - Coater #3)~~ **either Coater #2 and Coater #3** and ~~the two (2) dryers (Dryer #2 and Dryer #3)~~ **Coater #3 and Dryer #3 are in operation. Both coating lines (Coater #2 and Coater #3) shall not be operated concurrently.**

Comment (3)

The latest stack testing results for catalytic thermal oxidizers #1 and #2, which were approved by IDEM, were performed on October 15, 2003. The initial FESOP (No. 183-14489-00033) required stack testing within 12 months of start-up of the two (2) oxidizers, to verify that the coating booths meet the criteria of a permanent total enclosures and that the oxidizers are maintaining a minimum overall control efficiency of 76.45% each. In accordance with permit Condition D.1.8, stack testing was required every five (5) years from the date of the latest valid compliance test. Based on permit Condition D.1.8 testing will be required prior to October 15, 2008.

Response (3)

IDEM agrees that these changes are appropriate. The compliance date for the testing requirements in Condition D.1.5 has been revised based on the schedule in the initial FESOP (No. 183-14489-00033). The following changes have been made to the FESOP (additions in bold, deletions in ~~strikeout~~):

D.1.5 Testing Requirements

~~Within 180 days after the issuance of this FESOP~~ **On or before October 15, 2008**, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform VOC and HAP testing (including but not limited to testing for toluene, xylene, and ethyl benzene) for the two (2) catalytic thermal oxidizers (Oxidizer #1 and Oxidizer #2) to verify that the catalytic thermal oxidizers are maintaining a minimum overall control efficiency of 95%, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Upon further review IDEM, OAQ has made the following changes to the FESOP (additions in bold, deletions in ~~strikeout~~):

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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 2-8-12.
- (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 describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-~~5674~~**0178** (ask for Compliance Section)

Facsimile No.: 317-233-~~5967~~**6865**

...

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, ~~at reasonable times,~~ any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, ~~at reasonable times,~~ substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-~~5674~~**0178**
Fax: 317-233-~~5967~~**6865**

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: ChromaSource, Inc.
Source Address: 2433 S. County Road 600 East, Columbia City, IN 46725
Mailing Address: 2433 S. County Road 600 East, Columbia City, IN 46725
FESOP No.: F183-22555-00033

This form consists of 2 pages

Page 1 of 2

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

 - The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-~~5674~~**0178**, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-~~5967~~**6865**), and follow the other requirements of 326 IAC 2-7-16

...

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit
(FESOP) Renewal

Source Background and Description

Source Name:	ChromaSource, Inc.
Source Location:	2401 S. County Road 600 East, Columbia City, IN 46725
County:	Whitley
SIC Code:	2672
Operation Permit No.:	183-14489-00033
Operation Permit Issuance Date:	October 19, 2001
Permit Renewal No.:	183-22555-00033
Permit Reviewer:	Tanya White/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from ChromaSource, Inc. relating to the operation of a stationary coating and laminating paper color sample manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) paper coating line, identified as CSI - Coater #1, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic thermal oxidizer, identified as Oxidizer #1, for VOC and HAP control, exhausting through one (1) stack (ID No. 1). CSI- Coater #1 was installed September 6, 2002;
- (b) One (1) paper coating line, identified as CSI - Coater #2, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a thermal oxidizer, identified as Oxidizer #2, for VOC and HAP control, exhausting through one (1) stack (ID No. 2). CSI- Coater #2 was installed September 6, 2002;
- (c) One (1) paper coating line, identified as CSI - Coater #3, using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic thermal oxidizer, identified as Oxidizer #2, for VOC and HAP control, exhausting through one (1) stack (ID No. 2). CSI- Coater #3 was installed July 1, 2002;
- (d) One (1) catalytic thermal oxidizer, identified as Oxidizer #1, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), controlling VOC and HAP emissions from one (1) paper coating line (CSI - Coater #1) and a container cleaning operation (CSI - Container Cleaner #1), exhausting through one (1) stack (ID No. 1). Catalytic thermal oxidizer #1 was installed September 6, 2002;
- (e) One (1) catalytic thermal oxidizer, identified as Oxidizer #2, with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), controlling VOC and HAP emissions from two (2) paper coating lines (CSI - Coater #2 and CSI - Coater #3), exhausting through one (1) stack (ID No. 2). Catalytic thermal oxidizer #2 was installed July 1, 2002; and

- (f) One (1) container cleaning operation, identified as CSI - Container Cleaner #1, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with a catalytic thermal oxidizer, identified as Oxidizer #1, for VOC and HAP control, exhausting through one (1) stack (ID No. 1). The container cleaning operation was installed September 6, 2002. All clean-up operations and solvent usage for the source are performed in this area.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:
 - (1) Two (2) boilers rated at 1.87 and 3.34 MMBtu/hr and constructed between October, 2001 and July, 2002; [326 IAC 6-2-4]
 - (2) Three (3) dryers, identified as Dryer #1, Dryer #2, and Dryer #3, each rated at 1.5 MMBtu/hr;
- (b) Combustion source flame safety purging on start-up;
- (c) Water based adhesives that are less than equal to 5% by volume of Volatile Organic Compounds (VOCs) excluding Hazardous Air Pollutants (HAPs);
- (d) Paved and unpaved roads and parking lots with public access;
- (e) Emergency generator as follows:
 - (1) A 30 KW, 3 phase unit, diesel generator powered by a 63 horsepower engine;
- (f) Other emergency equipment as follows:
 - (1) Stationary fire pumps;
- (g) Other activities or categories as follows:
 - (1) Paper cutting operations which cut the sheets of color samples to the proper size. These operations create small amounts of particulate matter (PM) which are swept with the paper scraps, etc. Total PM from these operations is less than the 0.551 lb/hr.

Existing Approvals

The source has been operating under the previous FESOP 183-14489-00033 issued on October 19, 2001, and the following amendments and revisions:

- (a) 183-16707-00033-First Administrative Amendment to FESOP 183-14489-00033 issued on December 3, 2002.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete FESOP renewal application for the purposes of this review was received on January 19, 2006.

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

Emission Calculations

See Appendix A (pages 1 through 7) of this document for detailed emission calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0.32
PM-10	1.24
SO ₂	0.10
VOC	3497.88
CO	13.67
NO _x	16.54

HAPs	Unrestricted Potential Emissions (tons/yr)
Toluene	1283.21
Xylenes	375.83
MEK	340.04
Ethylbenzene	77.55
Total	2076.63

- (a) The unrestricted potential emissions of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source’s potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Individual HAP	HAPs
CSI- Coaters #1, #2, and #3 CSI-Container Cleaner #1	-	-	-	(1) 99.1	-	-	(1) <10	(1) <25
Insignificant Activities (Natural Gas Combustion)	(2) 0.32	(2) 1.24	(2) 0.10	(2) 0.89	(2) 13.67	(2) 16.54	-	-
Total Emissions	0.32	1.24	0.10	<100	13.67	16.54	< 10	< 25

- (1) Based on 326 IAC 2-8 (FESOP) limit, utilizing 95% overall control.
- (2) Based on the potential to emit of boilers, dryers, an emergency generator, and miscellaneous insignificant activities, using AP-42 emission factors.

County Attainment Status

The source is located in Whitley County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Whitley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Whitley County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Whitley County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.32
PM-10	1.24
SO ₂	0.10
VOC	<100
CO	13.67
NO _x	16.54
Single HAP	< 10
Combination HAPs	<25

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this review.
- (b) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc are not included for the two (2) boilers because the emission units have a maximum design heat input capacity less than 2.9 MW (10 million Btu/hr).
- (c) The requirements of the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR Part 60, Subpart RR are not included for the paper coating lines because the source does not manufacture pressure sensitive tape and/or label materials.

- (d) The requirements of the New Source Performance Standards for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60, Subpart QQ are not included for the paper coating lines because the source does not use any publication rotogravure printing presses.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD) are not included for the two (2) boilers and three (3) dryers, because the requirements of 40 CFR 63 Subpart DDDDD are not applicable to sources that are minor sources of HAPs as defined in 40 CFR 63.2 or 40 CFR 63.761. See 326 IAC 2-8 (FESOP) section for limit discussion.
- (g) The one (1) container cleaning operation, identified as CSI-Container Cleaner #1 is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T, because it does not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, (40 CFR 63, Subpart JJJJ) are not included for the paper coating lines because this regulation is not applicable to minor sources of HAPs as defined in 40 CFR 63.2 or 40 CFR 63.761. See 326 IAC 2-8 (FESOP) section for limit discussion.

State Rule Applicability – Entire Source

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

This source is not subject to this rule because emissions of VOCs are limited to less than 250 tons per year and the potential emissions of all other criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)). See 326 IAC 2-8 (FESOP) section for limit discussion.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6-1 is applicable to sources constructed after October 7, 1974, and prior to January 1, 1980. This source was constructed in 2002. Therefore, the requirements of this rule are not applicable.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 2-8 (FESOP)

- (a) (1) The total combined VOC input to the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall be limited to less than 1982 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The catalytic thermal oxidizer for VOC control shall be in operation and control emissions from the three (3) paper coating lines and container cleaning operation at all times that the three (3) coating lines and container cleaning operation are in operation.
- (2) The minimum overall control efficiency of the catalytic thermal oxidizer shall be 95%. The above VOC input limit in conjunction with the use of the catalytic thermal oxidizer will limit source wide VOC emissions to less than 100 tons per year, including emissions from all insignificant activities. Therefore, the requirements of 326 IAC 2-7 do not apply. This condition shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (b) (1) The total combined input of any single HAP to the three (3) paper coating lines (identified as CSI - Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall be limited to less than 200 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The catalytic thermal oxidizer for HAP control shall be in operation and control emissions from the three (3) paper coating lines at all times that the three (3) coating lines and container cleaning operation are in operation.
- (2) The minimum overall control efficiency of the catalytic thermal oxidizer shall be 95%. The above HAP input limit in conjunction with the use of the catalytic thermal oxidizer will limit source wide emissions of any single HAP to less than 10 tons per year, including emissions from all insignificant activities. Therefore, the requirements of 326 IAC 2-7 do not apply. This condition shall also render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.
- (3) On December 19, 2005 the U.S.EPA amended 70 FR 75047 to delist Methyl Ethyl Ketone (MEK) as a Hazardous Air Pollutant. The source will no longer be required to limit or report MEK usage once 326 IAC 1-2-33.5 is amended to reflect the delisting. The delisting of MEK (LSA document #06-19) from the HAP list was proposed for March 10, 2006.
- (c) (1) The combined total HAP input to the three (3) paper coating lines (identified as CSI Coater #1, CSI - Coater #2 and CSI - Coater #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall be limited to less than 500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The catalytic thermal oxidizer for HAP control shall be in operation and control emissions from the three (3) paper coating lines at all times that the three (3) coating lines and container cleaning operation are in operation.

- (2) The minimum overall control efficiency of the catalytic thermal oxidizer shall be 95%. The above total HAP input limit in conjunction with the use of the catalytic thermal oxidizer will limit source wide total HAP emissions to less than 25 tons per year, including emissions from all insignificant activities. Therefore, the requirements of 326 IAC 2-7 do not apply. This condition shall also render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.
- (3) On December 19, 2005 the U.S.EPA amended 70 FR 75047 to delist Methyl Ethyl Ketone (MEK) as a Hazardous Air Pollutant. The source will no longer be required to limit or report MEK usage once 326 IAC 1-2-33.5 is amended to reflect the delisting. The delisting of MEK (LSA document #06-19) from the HAP list was proposed for March 10, 2006.
- (d) The VOC capture system for paper coating lines (Coater #1, #2 and #3) and the container cleaning operation (identified as CSI - Container Cleaner #1) shall meet the following criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:
 - (1) Any natural draft opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.
 - (2) The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - (3) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters per hour (200 feet per minute). The direction of air through all NDOs shall be into the enclosure.
 - (4) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c), shall be closed during routine operation of the process.
 - (5) All VOC emissions must be captured and contained for discharge through a control device.

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

The operation of the three (3) paper coating lines and the container cleaning operation (identified as CSI- Coater #1, CSI- Coater #2, CSI- Coater #3, and Container Cleaner #1) with controls (catalytic thermal oxidizer) are limited (as described under 326 IAC 2-8) such that, the entire source combined will emit less than 10 tons per year of any single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 MMBtu/hr or less and which began operation after September 21, 1983, shall in no case exceed 0.6 lb/MMBtu heat input.

This limitation is based on the lesser of the following equation or 0.6 lb/MMBtu:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = 1.87 + 3.34 = 5.21 MMBtu/hr

$$Pt = 1.09/5.21^{0.26} = 0.71 \text{ lbs PM/MMBtu}$$

Therefore, the PM emissions from each of the two (2) boilers, rated at 1.87 and 3.34 MMBtu per hour heat input, respectively, shall be limited to 0.6 pounds per MMBtu heat input each.

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

- (a) 326 IAC 8-2-5 applies to web coating or saturation process of paper, plastic, metal foil, and pressure sensitive tapes and labels regardless of substrate with actual VOC emissions greater than 15 pounds per day, if constructed after January 1, 1990 in any county. The one (1) paper coating line, identified as CSI - Coater #1, is subject to the requirements of 326 IAC 8-2-5 because the equipment is used for surface coating of paper. Pursuant to this 326 IAC 8-2-5(b), the owner or operator of a coating line subject to the rule shall not discharge into the atmosphere any volatile organic compounds (VOC) in excess of 2.9 pounds of VOCs per gallon of coating excluding water.

The worst case coating that will be used in the one (1) paper coating line contains 5.29 pounds of VOC per gallon of coating less water, which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. However, the source will use the catalytic thermal oxidizer (Oxidizer #1) to control VOC emissions in order to achieve this emission limitation pursuant to 326 IAC 8-1-2.

Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the use of the catalytic thermal oxidizer, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

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

where: L = Applicable emission limit in pounds of VOC per gallon of coating
= 2.9 pounds VOC per gallon of coating less water
D = Density of VOC in coating in pounds per gallon of VOC
= 7.36 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied
= 4.79 pounds VOC per gallon of coating solids

Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the capture and control system is determined by the following equation:

$$O = ((V-E)/V)*100$$

where: V = the actual VOC content of the coating in pounds of VOC per gallon of coating solids as applied
= 20.34 pounds VOC per gallon of coating solids (Determined by the following equation: (Density (lbs/gal) * Weight % organics) / (Volume % solids))
E = 4.79 pounds VOC per gallon of coating solids
O = Equivalent overall control efficiency of the capture system and control device as a percentage
= 76.45%

The CSI - Coater #1 is in compliance with the emission limit of 2.9 pounds VOC per gallon of coating less water under 326 IAC 8-2-5, since the catalytic thermal oxidizer (Oxidizer #1) has an overall control efficiency of 95%, which exceeds the required control efficiency of 76.45%.

- (b) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations) the two (2) paper coating lines, identified as CSI - Coater #2 and CSI - Coater #3, are subject to the requirements of 326 IAC 8-2-5 because the equipment is used for surface coating of paper. Pursuant to 326 IAC 8-2-5(b), the owner or operator of a coating line subject to the rule shall not discharge into the atmosphere any volatile organic compounds (VOC) in excess of 2.9 pounds of VOCs per gallon of coating excluding water.

The worst case coating that will be used in the two (2) paper coating lines, identified as CSI - Coater #2 and CSI - Coater #3, contains 5.29 pounds of VOC per gallon of coating less water, which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. However, the source will use the catalytic thermal oxidizer (Oxidizer #2) to control VOC emissions in order to achieve this emission limitation pursuant to 326 IAC 8-1-2.

Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the use of the catalytic thermal oxidizer, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

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

where: L = Applicable emission limit in pounds of VOC per gallon of coating
= 2.9 pounds VOC per gallon of coating less water
D = Density of VOC in coating in pounds per gallon of VOC
= 7.36 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))
E = Equivalent emission limit in pounds of VOC per gallon of coating solids
as applied
= 4.79 pounds VOC per gallon of coating solids

Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the capture and control system is determined by the following equation:

$$O = ((V-E)/V)*100$$

where: V = the actual VOC content of the coating in pounds of VOC per gallon of coating solids as applied
= 20.34 pounds VOC per gallon of coating solids (Determined by the following equation: (Density (lbs/gal) * Weight % organics) / (Volume % solids))
E = 4.79 pounds VOC per gallon of coating solids
O = Equivalent overall control efficiency of the capture system and control device as a percentage
= 76.45%

The CSI - Coater #2 and CSI - Coater #3 are in compliance with the emission limit of 2.9 pounds VOC per gallon of coating less water under 326 IAC 8-2-5, since the catalytic thermal oxidizer (Oxidizer #2) has an overall control efficiency of 95%, which exceeds the required control efficiency of 76.45%.

326 IAC 8-3-2 (Cold Cleaner Operation)

Container Cleaner #1 does not meet the definition of a cold cleaner degreaser in 326 IAC 8-3-2 because it is not a tank as defined under 326 IAC 1-2-18.5 and thus 326 IAC 8-3-2 is not applicable.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Container Cleaner #1 does not meet the definition of a cold cleaner degreaser in 326 IAC 8-3-5 because it is not a tank as defined under 326 IAC 1-2-18.5 and thus 326 IAC 8-3-5 is not applicable.

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

Paper cutting operations have a combined PM potential to emit of less than 0.551 lb/hr. Therefore paper cutting operations are exempt from the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 do not apply.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

The emergency diesel generator is not subject to the requirements of 326 IAC 7-1.1-2 because the generator has the potential to emit of SO₂ less than 25 tons per year. Pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7-1.1-2 do not apply.

Testing Requirements

Within 180 days after the issuance of this FESOP, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform VOC and HAP testing (including but not limited to testing for toluene, xylene, and ethyl benzene) for the two (2) catalytic thermal oxidizers (Oxidizer #1 and Oxidizer #2) to verify that the catalytic thermal oxidizers are maintaining a minimum overall control efficiency of 95%, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing. The coatings applied at each of the three coating facilities are subject to the 2.9 pounds VOC per gallon of coating, less water, limits per 326 IAC 8-2-5. However, the source will use coatings with higher VOC contents, but will comply with the limit of 326 IAC 8-2-5 through the utilization of an emissions capture and control system. Such a system shall also limit source emissions of VOC, single HAP and total HAPs to less than Part 70 permitting levels of 100, 10 and 25 tons per year, respectively.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The catalytic thermal oxidizer (Oxidizer #1) for the one (1) paper coating line (identified as CSI - Coater #1) and Container Cleaner #1 and the catalytic thermal oxidizer (Oxidizer #2) for the two (2) paper coating lines (identified as CSI - Coater #2 and Coater #3) have applicable compliance monitoring conditions as specified below:
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three hour average temperature of the thermal oxidizer is below 500°F. A three hour average temperature that is below 500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) The Permittee shall determine the three hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1 and D.1.2, as approved by IDEM.
 - (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three hour average temperature of the thermal oxidizer is below the three hour average temperature as observed during the compliant stack test. A three hour average temperature that is below the three hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the catalytic thermal oxidizers for the three (3) paper coating lines (CSI - Coater #1, #2, and #3) and the container cleaner operation must operate properly to ensure compliance with 326 IAC 2-8 (FESOP), 326 IAC 8-2-5 (Paper Coating Operations), and 326 IAC 2-2 (PSD).

Conclusion

The operation of this stationary coated and laminated paper color sample manufacturing facility shall be subject to the conditions of the FESOP 183-22555-00033.

Appendix A: Emission Calculations

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. County Road 600 East, Columbia City, IN 46725
FESOP: 183-22555-00033
Reviewer: Tanya White/EVP
Date: February, 2006

Uncontrolled Unlimited Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	CSI - Coaters #1, #2, and #3, and Container Cleaner #1	Combustion Sources	Emergency Generator	TOTAL
PM	0.00	0.31	0.01	0.32
PM10	0.00	1.23	0.01	1.24
SO2	0.00	0.10	0.01	0.10
NOx	0.00	16.17	0.38	16.54
VOC	3,496.08	0.89	0.01	3,496.98
CO	0.00	13.58	0.09	13.67
total HAPs	2,076.63	0.00	0.00	2,076.63
worst case single HAP	1,283.21	0.00	0.00	1,283.21
	Toluene			

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Limited Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	CSI - Coaters #1, #2, and #3, and Container Cleaner #1	Combustion Sources	Emergency Generator	TOTAL
PM	0.00	0.31	0.01	0.32
PM10	0.00	1.23	0.01	1.24
SO2	0.00	0.10	0.01	0.10
NOx	0.00	16.17	0.38	16.54
VOC	99.10	0.89	0.01	<100
CO	0.00	13.58	0.09	13.67
total HAPs	<25	0.00	0.00	<25
worst case single HAP	<10	0.00	0.00	<10

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations

VOC and Particulate
From Surface Coating Operations

Company Name: ChromaSource, Inc.
 Address City IN Zip: 2401 S. County Road 600 East, Columbia City, IN 46725
 FESOP: 183-22555-00033
 Reviewer: Tanya White/EVP
 Date: February, 2006

Material	Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
CSI Color Card Lacquer NAD0351	CSI-Coater #1	9.08	58.235%	0.0%	58.2%	0.0%	26.00%	1.00000	50.000	5.29	5.29	264.39	6345.29	1158.01	0.00	20.34	100%

Potential Emissions (tons/yr) Add worst case coating to all solvents 264.39 6345.29 1158.01 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. County Road 600 East, Columbia City, IN 46725
FESOP: 183-22555-00033
Reviewer: Tanya White/EVP
Date: February, 2006

Material	Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
CSI Color Card Lacquer NAD0351	CSI-Coater #2	9.08	58.235%	0.0%	58.2%	0.0%	26.00%	1.00000	50.000	5.29	5.29	264.39	6345.29	1158.01	0.00	20.34	100%

Potential Emissions (tons/yr) **Add worst case coating to all solvents** **264.39 6345.29 1158.01 0.00**

Material	Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
CSI Color Card Lacquer NAD0351	CSI-Coater #3	9.08	58.235%	0.0%	58.2%	0.0%	26.00%	1.00000	50.000	5.29	5.29	264.39	6345.29	1158.01	0.00	20.34	100%

Potential Emissions (tons/yr) **Add worst case coating to all solvents** **264.39 6345.29 1158.01 0.00**

Total Potential Emissions for Coater #2 and Coater #3 (tons/yr) **528.77 12690.57 2316.03 0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. County Road 600 East, Columbia City, IN 46725
FESOP: 183-22555-00033
Reviewer: Tanya White/EVP
Date: February, 2006

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)
CSI-Coater #1											
CSI Color Card Lacquer NAD0351	9.08	1.000000	50.00	1.30%	6.30%	21.40%	5.70%	25.85	125.28	425.54	113.35
Generic Wash Solvent	6.8	1.000000	0.03	0.00%	0.00%	26.60%	0.00%	0.00	0.00	0.24	0.00
CSI-Coater #2											
CSI Color Card Lacquer NAD0351	9.08	1.000000	50.00	1.30%	6.30%	21.40%	5.70%	25.85	125.28	425.54	113.35
Generic Wash Solvent	6.8	1.000000	0.03	0.00%	0.00%	26.60%	0.00%	0.00	0.00	0.24	0.00
CSI-Coater #3											
CSI Color Lacquer NAD0351	9.08	1.000000	50.00	1.30%	6.30%	21.40%	5.70%	25.85	125.28	425.54	113.35
Generic Wash Solvent	6.8	1.000000	0.03	0.00%	0.00%	26.60%	0.00%	0.00	0.00	0.24	0.00
CSI - Container Cleaner #1											
Generic Wash Solvent	6.8	0.740000	1.00	0.00%	0.00%	26.60%	0.00%	0.00	0.00	5.86	0.00

Total Potential Emissions (tons/yr)

77.55 375.83 1283.21 340.04

Total Uncontrolled HAPs (tons/yr) = 2076.63

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. County Road 600 East, Columbia City, IN 46725
FESOP: 183-22555-00033
Reviewer: Tanya White/EVP
Date: February, 2006

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
36.91	323.3

Facilities	MMBtu/hr
CSI Oxidizer #1	13.6
CSI Oxidizer #2	13.6
CSI Dryer #1	1.5
CSI Dryer #2	1.5
CSI Dryer #3	1.5
Boiler	1.87
Boiler	3.34
Total	36.91

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.31	1.23	0.10	16.17	0.89	13.58

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations
Emergency Generator - Diesel Fuel
Turbine (<600 HP)**

Company Name: ChromaSource, Inc.
Address City IN Zip: 2401 S. County Road 600 East, Columbia City, IN 46725
FESOP: 183-22555-00033
Reviewer: Tanya White/EVP
Date: February, 2006

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

Estimated
S= 0.04 = WEIGHT % SULFUR

0.44

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.0 (1.01S)	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	0.0	0.0	0.0	0.4	0.0	0.1

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)

Heat Input Capacity
Horsepower (hp)

Potential Throughput
hp-hr/yr

Estimated
S= 0.04 = WEIGHT % SULFUR

63.0

31500.0

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.0007	0.00070 not provided	0.0003 (.00809S)	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	0.0	0.0	0.0	0.4	0.0	0.1

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr
 Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.
 An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Throughput (hp-hr/yr) = hp * 500 hr/yr

Emission factors from AP 42 (Supplement B 10/96) Table 3.4-1 and Table 3.4-2 for large engines were used because emissions are very low and emissions factors for small engines are not established in AP-42.

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] *500 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.