



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: June 8, 2006  
RE: Products Specialties, Inc. / 043-22602-00039  
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



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

---

*Mitchell E. Daniels, Jr.*  
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Mr. Bob Scott  
Product Specialties, Inc.  
2073 McDonald Avenue  
New Albany, Indiana 47150

June 8, 2006

Re: 043-22602-00039  
First Significant Revision to  
FESOP No.: 043-15615-00039

Dear Mr. Scott:

Product Specialties, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on January 22, 2003 for a stationary plastic film manufacturing plant, located at 2073 McDonald Avenue, New Albany, Indiana 47150. A letter requesting changes to this permit was received on February 6, 2006. Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of revising the VOC emission limitations for the three (3) printing presses (identified as EU-09, EU-11 and EU-13) to a combined limit equal to 12.41 tons per year.

Furthermore, after extensive evaluation and deliberation, IDEM, OAQ has concluded that certain permit conditions that are routinely appealed in FESOPs could be altered in a manner that would be less burdensome on the Permittee but would still ensure that sources can demonstrate compliance with State and Federal Regulations on a continuous basis. Product Specialties, Inc. has requested that such changes be made to their existing permit. These changes, including the relaxation of compliance monitoring frequency, are being made, pursuant to 326 IAC 2-8-11.1(f).

The following conditions are applicable to the proposed project:

1. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
2. All requirements and conditions of this approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

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

#### Attachments

ERG/SD

cc: File – Floyd County  
U.S. EPA, Region V  
Floyd County Health Department  
Air Compliance Section Inspector – Ray Schick  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling - Michele Boner



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

**Product Specialties, Inc.  
2073 McDonald Avenue  
New Albany, Indiana 47150**

(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.**

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.

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.

Operation Permit No.: F043-15615-00039	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 22, 2003 Expiration Date: January 22, 2008
First Administrative Amendment No.: 043-19075-00039, issued July 21, 2004 Second Administrative Amendment No.: 043-20492-00039, issued January 11, 2005	
First Significant Permit Revision No.: 043-22602-00039	Affected pages: 4, 6-9, 11-15, 18-25, 32-36
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 8, 2006 Expiration Date: January 22, 2008



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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 plastic film manufacturing plant.

Authorized individual:	Vice President
Source Address:	2073 McDonald Avenue, New Albany, Indiana 47150
Mailing Address:	2073 McDonald Avenue, New Albany, Indiana 47150
General Source Phone:	(812) 945-0920
SIC Code:	3081
Source Location Status:	Floyd
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules, Emission Offset and New Source Review Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) PVC resin powder storage silo, identified as EU-01, with a maximum storage capacity of 78.8 tons, using a baghouse for particulate matter control, and exhausting to stack vent V1;
- (b) One (1) calcium carbonate (CaCO<sub>3</sub>) storage silo, identified as EU-02, with a maximum storage capacity of 61 tons, using a baghouse for particulate matter control, and exhausting to stack vent V2;
- (c) One (1) plastic film mixing line, identified as EU-05, with a maximum capacity of 1588 pounds per hour, using a baghouse for particulate matter control, exhausting to stack vent V3;
- (d) Two (2) extrusion units, identified as EU-06 and EU-07, each having a limited throughput of 1020 pounds per hour, exhausting to stacks S4 and S5;
- (e) One (1) rotogravure press, identified as EU-09, with a maximum coverage of 15 pounds of ink per million square inches (lb/million in<sup>2</sup>) of PVC sheet, exhausting to stack S7;
- (f) One (1) rotogravure press with four (4) color printing heads, identified as EU-11, with a maximum coverage of 14.4 pounds of ink per million square inches (lb/million in<sup>2</sup>) of PVC sheet, exhausting to stack S10;
- (g) One (1) rotogravure press with four (4) color printing heads, identified as EU-13, with a maximum coverage of 14.4 pounds of ink per million square inches (lb/million in<sup>2</sup>) of sheet vinyl, exhausting to stacks S12 and S13;
- (h) Two (2) laminators, identified as EU-14 and EU-12, each having a limited production rate of 4,670,000 yds laminated film/year, exhausting to stacks S14 and S8.

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 the heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas-fired boiler rated at 2.7 MMBTU per hour;
  - (2) One (1) natural gas-fired boiler rated at 2.0 MMBtu/hr;
  - (3) Two (2) natural gas-fired indirect heaters rated at 0.75 MMBtu/hr each;
  - (4) Two (2) natural gas fired dryers rated at 304,000 BTU/hr each;
  - (5) One (1) natural gas fired space heater rated at 580,000 BTU/hr; and
  - (6) One (1) natural gas fired indirect heater for EU-13 rated at 2.0 MMBtu/hr.
- (b) One (1) cold cleaner degreasing operation with a capacity of 20 gallons to clean small parts;
- (c) VOC/HAP storage containers for lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Equipment relating to manufacturing activities that does not result in HAP emissions including brazing equipment, cutting torches, soldering equipment, and welding equipment;
- (e) Closed loop heating and cooling systems;
- (f) Natural draft cooling towers not regulated under a NESHAP;
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (h) Paved and unpaved roads and parking lots with public access;
- (i) Blow down for sight glass, boiler, compressors, pumps, and cooling towers.
- (j) Emission units whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):
  - (1) Three (3) granulators that chop waste film and recirculate to the mixing line; and
  - (2) One (1) plastisol mixing line.

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]**

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

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

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- (a) This permit 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]**

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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 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to 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.

### **B.5 Enforceability [326 IAC 2-8-6]**

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

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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.7 Severability [326 IAC 2-8-4(4)]**

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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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.9 Duty to Provide Information [326 IA 2-8-4(5)(E)]**

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- (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.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by 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.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (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 in letter form no later than April 15 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.13 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 contributes to any violation. 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.14 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, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 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.16 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.17 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, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 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.19 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). The Permittee shall make such records available, upon reasonable request, to 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.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

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

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2][IC 13-17-3-2] [IC13-30-3-1]**

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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.

B.22 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.23 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-16]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### 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] [326 IAC 2-2]

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) 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.

(c) 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]**

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

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

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- (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 14-10-4-1 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) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

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- (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 source 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]**

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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)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

#### **C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

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

case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

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

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (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 have a scale such that the expected normal reading 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 pressure gauge or other 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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]**

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

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. 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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (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, any quarterly report 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.19 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)]: Plastic Film Manufacturing Operation**

- (a) One (1) PVC resin powder storage silo, identified as EU-01, with a maximum storage capacity of 78.8 tons, using a baghouse for particulate matter control, and exhausting to stack vent V1;
- (b) One (1) calcium carbonate (CaCO<sub>3</sub>) storage silo, identified as EU-02, with a maximum storage capacity of 61 tons, using a baghouse for particulate matter control, and exhausting to stack vent V2;
- (c) One (1) plastic film mixing line, identified as EU-05, with a maximum capacity of 1588 pounds per hour, using a baghouse for particulate matter control, exhausting to stack vent V3;
- (d) Two (2) extrusion units, identified as EU-06 and EU-07, each having a limited throughput of 1020 pounds per hour, exhausting to stacks S4 and S5;
- (e) One (1) rotogravure press, identified as EU-09, with a maximum coverage of 15 pounds of ink per million square inches (lb/million in<sup>2</sup>) of PVC sheet, exhausting to stack S7;
- (f) One (1) rotogravure press with four (4) color printing heads, identified as EU-11, with a maximum coverage of 14.4 pounds of ink per million square inches (lb/million in<sup>2</sup>) of PVC sheet, exhausting to stack S10;
- (g) One (1) rotogravure press with four (4) color printing heads, identified as EU-13, with a maximum coverage of 14.4 pounds of ink per million square inches (lb/million in<sup>2</sup>) of sheet vinyl, exhausting to stacks S12 and S13;
- (h) Two (2) laminators, identified as EU-14 and EU-12, each having a limited production rate of 4,670,000 yds laminated film/year, exhausting to stacks S14 and S8.

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

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

**D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emission rate from the storage silos (EU-1 & EU-2), the mixing operations (EU-5), the extrusion units (EU-6 & EU-07), and the laminating lines (EU-14 and EU-12) shall not exceed the following allowable PM emissions when operating at a process weight rate as shown in the table below:

Process Facility	Stack ID	Process Throughput (tons/hr)	Allowable PM Emissions (lbs/hr)
Resin Powder Storage Silo (EU-1)	V1	0.44	2.37
CaCO <sub>3</sub> Storage Silo (EU-2)	V2	0.29	1.79
Plastic Film Mixing Line, EU-05	V3	0.794	3.52
Extrusion Unit, EU-06	S4	0.51	1.66
Extrusion Unit, EU-07	S5	0.51	1.66
Laminator, EU-14	S14	0.675	3.15
Laminator, EU-12	S8	0.844	3.66

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]**

---

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating VOC Limitations), the VOC content of the coatings used from the rotogravure presses EU-09, EU-11, and EU-13 to completely saturate the substrate shall be limited to 4.8 pounds of VOC per gallon of coating less water delivered to the applicator.

**D.1.3 Volatile Organic Compounds [326 IAC 2-8] [326 IAC 8-1-6] [326 IAC 20][40 CFR 63, Subpart KK]**

---

Pursuant to 326 IAC 2-8, the following facilities shall be limited as follows:

- (a) The total material compounded from extruders EU-06 and EU-07 shall not exceed 9,127,920 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.0043 lb VOC/lb compounded. These limits are equivalent to total VOC emissions of 19.6 tons.
- (b) The VOC input for the rotogravure presses (identified as EU-09, EU-11, and EU-13) shall not exceed 12.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The production rate of laminators EU-14 and EU-12 shall each not exceed 4,670,000 yards of film per twelve (12) consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.0065 pounds of VOC per yard of film. These limits are equivalent to VOC emissions of 15.17 tons per year of VOC total for each of the two laminators for a total of 30.34.
- (d) The input of a single HAP to the printers (EU-09, EU-11, and EU-13) shall not exceed 9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The input of a combination of HAPs to the printers (EU-09, EU-11, and EU-13) shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The limits in conditions D.1.3(a) through (c) are equivalent to less than 68 tons per year of VOC. These limits ensure that the VOC emissions for the entire source are less than one hundred (100) tons per year. The HAP input limits are equivalent to emissions of single HAPs of less than 10 tons per year and 25 tons per year of a combination of HAPs from the entire source. Therefore, the requirements of 326 IAC 2-7 are not applicable. The limit in D.1.3 (c) ensures that 326 IAC 8-1-6 does not apply to the laminators. The limit in D.1.3 (d) ensures that 326 IAC 20 and 40 CFR Subpart KK do not apply.

**D.1.4 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]**

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The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to printing operations EU-09, EU-11, and EU-13 except when otherwise specified in 40 CFR Part 60, Subpart FFF.

**D.1.5 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60, Subpart FFF]**

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Pursuant to 40 CFR 60.582(a)(1), the permittee shall use inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids in the printing operations EU-09, EU-11, and EU-13.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

## Compliance Determination Requirements

### D.1.7 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60, Subpart FFF]

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Compliance with the VOC content contained in Condition D.1.5 shall be determined pursuant to 40 CFR 60.583(c) using plant blending and inventory records for each affected facility in conjunction with ink manufacturers' formulation data.

### D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

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Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.2 and D.1.3 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.

### D.1.9 Particulate Control [326 IAC 2-8-5(a)(4)]

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- (a) In order to comply with D.1.1, the baghouses for PM control shall be in operation and control emissions from the silos (EU-1, and EU-2) and the plastic film mixing line (EU-5) at all times that the plastic film manufacturing is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

### D.1.10 Visible Emissions Notations

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- (a) Visible emission notations of the plastic film mixing line (EU-5) baghouse stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations from each storage silo baghouse stack exhaust (EU-1 and EU-2) shall be performed during loading operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) If abnormal emissions are observed, the Permittee shall take reasonable steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

### D.1.11 Parametric Monitoring

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The Permittee shall record the pressure drop across each baghouse associated with the plastic film mixing line (EU-5), at least once per day when each plastic film line is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take

reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.12 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### D.1.13 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.10, the Permittee shall maintain records of the visible emission notations of each plastic film line (EU-5) stack exhaust once per day and the visible emission notations performed during loading operations of the silos (EU-1 and EU-2).
- (b) To document compliance with Condition D.1.12, the Permittee shall maintain per day records of the pressure drop during normal operation for the plastic film mixing line (EU-5).
- (c) To document compliance with VOC and HAPs content and usage limits in Conditions D.1.2, D.1.3, and D.1.5 the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Conditions D.1.2, D.1.3, and D.1.5.
  - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The weighted average VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC and HAP usage for each month; and

- (6) The weight of VOCs and HAPs emitted for each compliance period.
  - (7) The total material compounded from extruders (identified as EU-6 and EU-7) per month.
  - (8) The yards of film produced by laminators (identified as EU-12 and EU-14) per month.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.14 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, 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.

#### D.1.15 Reporting Requirements [40 CFR 60.580, Subpart FFF]

---

- (a) The Permittee shall submit semi-annual reports to the Commissioner of exceedances of the weighted average Volatile Organic Compound (VOC) content, specified in §60.582(a)(1). These reports shall be postmarked within 30 days following the end of the second and fourth calendar quarters
- (b) The requirements of 40 CFR 60.585 remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternate means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description: Insignificant Activities

- (a) Natural gas fired combustion sources with the heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas-fired boiler rated at 2.7 MMBTU per hour;
  - (2) One (1) natural gas-fired boiler rated at 2.0 MMBtu/hr;
  - (3) Two (2) natural gas-fired indirect heaters rated at 0.75 MMBtu/hr each;
  - (4) Two (2) natural gas fired dryers rated at 304,000 BTU/hr each;
  - (5) One (1) natural gas fired space heater rated at 580,000 BTU/hr; and
  - (6) One (1) natural gas fired indirect heater for EU-13 rated at 2.0 MMBtu/hr.
- (b) One (1) cold cleaner degreasing operation with a capacity of 20 gallons to clean small parts;
- (c) VOC/HAP storage containers for lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Equipment relating to manufacturing activities that does not result in HAP emissions including brazing equipment, cutting torches, soldering equipment, and welding equipment;
- (e) Closed loop heating and cooling systems;
- (f) Natural draft cooling towers not regulated under a NESHAP;
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (h) Paved and unpaved roads and parking lots with public access;
- (i) Blow down for sight glass, boiler, compressors, pumps, and cooling towers.
- (j) Emission units whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):
  - (1) Three (3) granulators that chop waste film and recirculate to the mixing line; and
  - (2) One (1) plastisol mixing line.

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

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

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

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 2.7 million BTU/hour boiler and 2.0 MMBtu/hr boiler, which were constructed after September 21, 1983, shall each be limited to 0.60 pound per million BTU heat input.

#### D.2.2 Particulate [326 IAC 6-3-2]

---

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the brazing, soldering, welding, and cutting torch equipment or the three (3) granulators that chop waste film shall not exceed allowable PM emission rate based on the following equation:

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

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

#### D.2.3 Volatile Organic Compounds [326 IAC 8-3-2] [326 IAC 8-3-5]

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That pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Degreaser Operation and Control), the degreasing operation shall comply with the requirements of this rule.

- (a) According to 326 IAC 8-3-2, the owner or operator shall:
- (1) Equip the cleaner with a cover;
  - (2) Equip the cleaner with a facility for draining cleaned parts;
  - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label summarizing the operation requirements; and
  - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) According to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one hand if:
    - A) The solvent volatility is greater than three-tenths (0.3) pounds per square inch (15 millimeters of mercury) measured at 38 degrees Celsius (100 degrees Fahrenheit);
    - B) The solvent is agitated; or
    - C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5(b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>o</sup>C) (one hundred twenty degrees Fahrenheit (120<sup>o</sup>F)):
    - A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) That pursuant to 326 IAC 8-3-5(b), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039

**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  
P.O. Box 6015  
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: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe 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  
CThe Permittee must submit notice in writing or by facsimile within two (2) 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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

### FESOP Quarterly Report

Source Name: Product Specialties, Inc.  
 Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
 Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
 FESOP No.: 043-15615-00039  
 Facility: Laminators EU-14 and EU-12  
 Parameter: Production Limits  
 Limit: 4,670,000 yards of film/per twelve consecutive month period with compliance determined at the end of each month for each laminator (EU-14 and EU-12)

YEAR:

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	EU-12	EU-14	EU-12	EU-14	EU-12	EU-14
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Product Specialties, Inc.  
 Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
 Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
 FESOP No.: 043-15615-00039  
 Facility: Extruders EU-6 and EU-7  
 Parameter: Production Limits  
 Limit: Total of 9,127,920 pounds of material compounded per twelve consecutive month period with compliance determined at the end of each month for EU-6 and EU-7

YEAR:

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Press EU-09, EU-11, and EU-13  
Parameter: VOC Input  
Limit: 12.4 tons VOC input per twelve consecutive month period with compliance determined at the end of the month

YEAR:

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

9 No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Presses: EU-09, EU-11, and EU-13  
Parameter: Single HAP Input  
Limit: 9 tons of input of a single HAP per twelve 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
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Presses: EU-09, EU-11, and EU-13  
Parameter: Combination of HAPs  
Limit: 24 tons of input of a combination of HAPs per twelve 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
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a Significant Permit Revision  
to a Federally Enforceable State Operating Permit (FESOP)**

**Source Background and Description**

Source Name:	Product Specialties, Inc.
Source Location:	2073 McDonald Avenue, New Albany, Indiana 47150
County:	Floyd
SIC Code:	3081
Operation Permit No.:	F043-15615-00039
Operation Permit Issuance Date:	January 22, 2003
Significant Permit Revision No.:	043-22602-00039
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a revision application from Product Specialties, Inc. relating to the operation of a stationary plastic film manufacturing plant.

**History**

On February 6, 2006, Product Specialties, Inc., submitted an application to IDEM, OAQ requesting approval to combine the individual VOC emission limitations for the three (3) printing presses (identified as EU-09, EU-11 and EU-13) pursuant to the provisions of 326 IAC 2-8 (FESOP) and to revise the general permit conditions in a manner that is less burdensome for the Permittee but which still ensures that the Permittee can demonstrate compliance with the State and Federal regulations on a continuous basis.

IDEM, OAQ has determined to revise the current FESOP for Product Specialties, Inc. permit No.: 043-15615-00039 issued January 22, 2003, pursuant to 326 IAC 2-8-11.1(f)(11)(c) - Significant Permit Revision.

**Existing Approvals**

The source was issued FESOP No.: F043-15615-00039 on January 22, 2003. The source has since received the following:

- (a) First Administrative Amendment No.: 039-19075-00039, issued on July 21, 2004.
- (b) Second Administrative Amendment No.: 039-20492-00039, issued on January 11, 2005.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

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

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

An application for the purposes of this review was received on February 6, 2006.

**Emission Calculations**

There are no emission calculations included as part of this revision. There is no increase or decrease in the potential to emit of any criteria pollutants.

**Potential To Emit of the Revision**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Note: There will be no change in the potential emissions of VOC or HAPs as a result of this revision. The Permittee shall continue to comply with the provisions of 326 IAC 2-8 (FESOP) as described in permit No. 043-15615-00039, issued January 22, 2003, and the combined potential VOC emissions from the three (3) printing presses (identified as EU-09, EU-11, and EU-13) will continue to be limited to 12.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

**Justification for Revision**

The FESOP is being modified through a Significant Permit Revision pursuant to the provisions of 326 IAC 2-8-11.1(f)(11)(c) because the revisions change existing requirements for the emission units or processes under the cap and the revision also involves significant changes to the permit.

After extensive evaluation and deliberation, IDEM, OAQ has concluded that certain permit conditions that are routinely appealed in FESOPs could be altered in a manner that would be less burdensome on the Permittee but would still ensure that sources can demonstrate compliance with State and Federal Regulations on a continuous basis. These changes, including the relaxation of compliance monitoring frequency are being made pursuant to 326 IAC 2-8-11.1(f).

**Potential to Emit After Revision**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Process/facility	Potential to Emit after Issuance (tons/year)						
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAPS
Storage Silo of Resin (EU-01)	25.1	25.1	0.0	0.0	0.0	0.0	0.0
Storage Silo of CaCO <sub>3</sub> (EU-02)	16.5	16.5	0.0	0.0	0.0	0.0	0.0
Plastic Film Line (EU-05)	12.4	12.4	0.0	0.0	0.0	0.0	0.0
Extruder (EU-06)	5.3	5.3	0.0	0.0	0.0	Less than 9.8	0.0
Extruder (EU-07)	5.3	5.3	0.0	0.0	0.0	Less than 9.8	0.0

Process/facility	Potential to Emit after Issuance (tons/year)						
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAPS
Laminator (EU-14)	1.2	1.2	0.0	0.0	0.0	Less than 15.2	0.0
Laminator (EU-12)	1.2	1.2	0.0	0.0	0.0	Less than 15.2	0.0
Printer (EU-09)	--	--	--	--	--	Less than 1.6	Less than 9 tons per year of a single HAP, less than 24 tons per year of a combination of HAPs
Printer (EU-11)	--	--	--	--	--	Less than 16.2	
Printer (EU-13)	--	--	--	--	--	Less than 4.7	
Printer (EU-09)	0.0	0.0	0.0	0.0	0.0	Less than 12.4	Less than 9 tons per year of a single HAP, less than 24 tons per year of a combination of HAPs
Printer (EU-11)	0.0	0.0	0.0	0.0	0.0		
Printer (EU-13)	0.0	0.0	0.0	0.0	0.0		
Insignificant Units	0.3	0.3	0.0	2.30	0.50	5.60	0.1
Total Emissions	67.3	67.3	0.0	2.30	0.50	Less than 68	Less than 10 tons per year of a single HAP, less than 25 tons per year of a combination of HAPs

There are no changes in the potential emissions as result of this revision. The potential to emit of the criteria pollutants from the entire source will continue to be limited to less than the Title V major source thresholds pursuant to the provisions of 326 IAC 2-8 (FESOP) as shown above and as included in FESOP No.:043-15615-00039, issued January 22, 2003 and 2<sup>nd</sup> Administrative Amendment No.: 039-20492-00039, issued January 11, 2005. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply to this source.

### County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Floyd County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate

PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements.

- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Floyd 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.
- (d) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability

#### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this revision for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this revision for this source.

#### **State Rule Applicability-Entire Source**

326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Non-attainment New Source Review), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

- (a) On April 15, 2004, the U.S. EPA named 23 counties and one partial county non-attainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Product Specialties, Inc. is located in Floyd County which is designated as non-attainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed under the provisions of 326 IAC 2-3 (Emission Offset). The Permittee is currently operating pursuant to the provisions of 326 IAC 2-8, FESOP No.: 043-15615-00039 issued January 22, 2003. A letter requesting an approval to combine the VOC emission limits for the three (3) existing printing presses (identified as EU-09, EU-11, and EU-13) was received on February 6, 2006. The combined potential VOC emissions from the three (3) printing presses will be equal to 12.4 tons per year, which is equal to the sum of the individual VOC limits for the three (3) printing presses as currently written in the FESOP. Therefore, this revision does not result in an increase in potential VOC emissions and the provisions of 326 IAC 2-3 (Emission Offset) do not apply.
- (b) Floyd County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM, OAQ will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 tons per year of any regulated pollutant. Product Specialties, Inc. has a limited potential to emit of PM10 below 100 tons per year. Therefore, assuming that

PM10 emissions represent PM2.5 emissions, the provisions of 326 IAC 2-1.1-5 (Non-attainment New Source Review) do not apply.

- (c) Product Specialties, Inc. is not in one (1) of the twenty-eight (28) listed source categories and is currently operating pursuant to the provisions of 326 IAC 2-8, FESOP No.: 043-15615-00039 issued January 22, 2003, which limits the potential to emit of each criteria pollutant to less than 100 tons per year. The source remains minor under PSD.

#### 326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP))

The Permittee shall continue to comply with the FESOP limits as described in permit No.: 043-15615-00039, issued January 22, 2003 and as shown under the Proposed Changes Section of the TSD. Compliance with the limitations under the provisions of 326 IAC 2-8 (FESOP) renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Floyd County and the potential to emit of each criteria pollutant is limited to less than one hundred (100) tons per year and the potential to emit of lead (Pb) is less than 5 tons per year. Therefore, the Permittee is not required to operate under the provisions of 326 IAC 2-7 (Part 70 Permit Program) and the provisions of 326 IAC 2-6 do not apply.

#### 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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

### **State Rule Applicability**

There are no changes to state rules included in this Significant Permit Revision to a FESOP.

### **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 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 described in revised FESOP (this permit).

## Proposed Changes

The following changes were requested in the application for this Significant Permit Revision. Bolded language has been added, and the language with a line through it has been deleted. The Table of Contents has been modified and conditions have been renumbered to reflect these changes.

1. The mailing address for IDEM, OAQ has been changed throughout the permit as shown below.

Indiana Department of Environmental Management  
100 North Senate Avenue, ~~P.O. Box 6015~~  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

2. IDEM, OAQ has moved the provision required by 326 IAC 2-8-4(5)(A) and (B) from Condition B.10 to the front page of the permit. Remaining conditions have been renumbered accordingly.

~~B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

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

~~(3) Denial of a permit renewal application.~~

~~(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

~~(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.~~

*(Permit Cover Page)*

...

**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.**

...

3. IDEM, OAQ has clarified Condition B.2 – Permit Term (formerly B.3) as follows:

~~B.32 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]~~

~~(a) This permit 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.**

4. IDEM, OAQ has included Term of Conditions pursuant to 326 IAC 2-1.1-9.5 as shown. The remaining conditions under Section B were renumbered accordingly.

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

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**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.**
5. IDEM, OAQ has included provisions of 326 IAC 2-1.1-9.5 as shown. Prior Permits Superseded condition was removed from Section A (Source Summary) and placed in Section B (General Conditions).

~~A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]~~

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~~(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either~~

~~(1) incorporated as originally stated,~~

~~(2) revised, or~~

~~(3) deleted~~

~~by this permit.~~

~~(b) All previous registrations and permits are superseded by this permit.~~

**B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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**(a) All terms and conditions of permits established prior to 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.**

6. IDEM, OAQ has revised Condition B.8 because the duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) and (b) has been removed from this condition and replaced with the revised information as shown.

~~B.89 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]~~

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

~~Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2254~~

~~The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).~~

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

~~(c) 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.~~

**(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.**

7. Annual Compliance Certification (ACC) are due April 15th for sources located in Clark, Elkhart, Floyd, Lake, Marion, Porter, St. Joseph, and Vanderburgh Counties; and ACC are due July 1 for all other sources. Product Specialties, Inc. is located in Floyd County. Therefore, Condition B.12 was revised as shown.

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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(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 in letter form no later than ~~July 1~~ **April 15** of each year to:

...

8. IDEM, OAQ has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM, OAQ has revised Section B.13 – Preventive Maintenance Plan, and has amended item (e) of Section B.14 – Emergency Provisions as follows:

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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...

~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

**(eb) 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 does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (dc) ~~Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.~~ **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.14 Emergency Provisions [326 IAC 2-8-12]

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...

- (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.**

...

9. For clarification, Condition B.19 – Operational Flexibility has been revised as shown below.

B.19 Operational Flexibility [326 IAC 2-8-15] **[326 IAC 2-8-11.1]**

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- (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:
- ...
- (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- ...
- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-8-15(b). ~~through (d)~~ **The Permittee shall make and makes** such records available, upon reasonable request, to 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 ~~in emissions in~~ **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).
- ...
- (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.**

10. IDEM, OAQ has clarified the rule cites in Condition B.21 - Inspection and Entry as follows:

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][**IC 13-17-3-2**][**IC 13-17-3-2**]  
**[IC13-30-3-1]**

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...

- (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.

11. The name of IDEM's billing section has been updated.

B.23 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]

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...

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, ~~IM & Billing~~, **Licensing, and Training** Section), to determine the appropriate permit fee.
12. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb. 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence. Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective March 16, 2005, and has been incorporated into your permit as follows:

**B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-16]**

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

13. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 (a) has been deleted. Condition D.1.1 was revised as shown.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour ~~[40 CFR 52 Subpart P]~~[326 IAC 6-3-2]

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- (a) ~~Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~
- (b) 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.

**D.1.1 Particulate Matter (PM) ~~[40 CFR 52 Subpart P]~~ **[326 IAC 6-3-2]****

Pursuant to ~~40 CFR 52 Subpart P~~ **326 IAC 6-3-2** (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emission rate from the storage silos (EU-1 & EU-2), the mixing operations (EU-5), the extrusion units (EU-6 & EU-07), and the laminating lines (EU-14, and EU-12) shall not exceed the following allowable PM emissions when operating at a process weight rate as shown in the table below:

...

14. IDEM, OAQ has determined that in order to avoid duplication of requirements which may be included in D sections, Condition C.7 shall be removed from the permit. Remaining conditions under Section C were renumbered accordingly.

**~~C.7~~ Operation of Equipment ~~[326 IAC 2-8-5(a)(4)]~~**

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

15. IDEM, OAQ realizes that the specifications of Condition C.13 (formerly C.14) can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

**~~C.1413~~ Pressure Gauge and Other Instrument Specifications ~~[326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]~~**

~~(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.~~

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

~~(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

**(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 have a scale such that the expected normal reading 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 pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.**

16. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop

and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

**C.1615 Compliance Response Plan – Preparation, Implementation, Records, and Reports  
Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~

- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.~~
- ~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (c) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
  - ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
  - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
  - ~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:
  - ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
  - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
  - ~~(3) An automatic measurement was taken when the process was not operating.~~~~

- ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (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.**

17. IDEM, OAQ has updated Condition C.18 (formerly C.19) - General Reporting Requirements as shown.

**C.4918 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The ~~source~~ **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 IAC2-1.1-1(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.**
18. On February 6, 2006, the Permittee submitted a letter to IDEM, OAQ requesting an approval to combine the VOC emission limits for the three (3) existing printing presses (identified as EU-09, EU-11, and EU-13). The combined potential VOC emissions from the three (3) printing presses will be equal to 12.4 tons per year, which is equal to the sum of the individual VOC limits for the three (3) printing presses as currently written in the FESOP. Therefore, this revision does not result in an increase in potential VOC emissions. Condition D.1.3 has been revised as shown and Condition D.1.8 has been updated. Quarterly Report forms were updated accordingly, including the correction of the production limit of laminators EU-14 and EU012 from 4,630,000 to 4,670,000 yards of film. One (1) laminator (previously also identified as EU-14) was removed from the source via Second Administrative Amendment No.: 039-20492-00039, issued January 11, 2005. The VOC limit for each of the remaining two (2) laminators is equal to 15.17 tons per year or a total of 30.34 tons of VOC per year.

**D.1.3 Volatile Organic Compounds [326 IAC 2-8] [326 IAC 8-1-6] [326 IAC 20][40 CFR 63, Subpart KK]**

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- ...
- (b) The VOC input for the rotogravure presses **(identified as EU-09, EU-11, and EU-13)** shall not exceed ~~6.2~~ **12.4** tons per twelve (12) consecutive month period with compliance determined at the end of each month. ~~This limit is equivalent to VOC emissions of less than 6.2 tons per year.~~
- ~~(c) The VOC input for the rotogravure press EU-09 shall not exceed 1.55 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to VOC emissions of less than 1.55 tons per year.~~
- ~~(d) The VOC input for the rotogravure press EU-13 shall not exceed 4.66 tons per twelve (12) month period with compliance determined at the end of each month. This limit is equivalent to VOC emissions of less than 4.66 tons per year.~~
- (ec) The production rate of laminators EU-14 and EU-12 shall each not exceed 4,670,000 yards of film per twelve (12) consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.0065 pounds of VOC per yard of film. These limits are equivalent to VOC emissions of 15.17 tons per year of VOC total for each of the two laminators for a total of ~~45.54~~**30.34**.
- (gd) The input of a single HAP to the printers (EU-09, EU-11, and EU-13) shall not exceed 9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The input of a combination of HAPs to the printers (EU-09, EU-11, and EU-13) shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The limits in conditions D.1.43 (a) through (fc) are equivalent to less than ~~80.8~~ **68** tons per year of VOC. These limits ensure that the VOC emissions for the entire source are less than one hundred

(100) tons per year. The HAP input limits are equivalent to emissions of single HAPs of less than 10 tons per year and 25 tons per year of a combination of HAPs from the entire source. Therefore, the requirements of 326 IAC 2-7 are not applicable. The limit in D.1.3 (fc) ensures that 326 IAC 8-1-6 does not apply to the laminators. The limit in D.1.3 (gd) ~~also~~ ensures that 326 IAC 20 and 40 CFR Subpart KK do not apply.

**D.1.8 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]**

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Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) ~~using formulation data supplied by the casting manufacturer~~ **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.**

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

**FESOP Quarterly Report**

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Laminators EU-14 and EU-12  
Parameter: Production Limits  
Limit: 4,6370,000 yards of film/per twelve consecutive month period with compliance determined at the end of each month for each laminator (EU-14 and EU-12)

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

**FESOP Quarterly Report**

Source Name: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Press EU-09, **EU-11, and EU-13**  
Parameter: VOC Input  
Limit: ~~4.55~~**12.4** tons VOC per twelve 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: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Presses: EU-09, EU-11, and EU-13  
Parameter: Single HAP Input  
Limit: 9 tons of input of a single HAP per twelve 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: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Presses: EU-09, EU-11, and EU-13  
Parameter: Combination of HAPs  
Limit: 24 tons of input of a combination of HAPs per twelve 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: Product Specialties, Inc.  
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150  
FESOP No.: 043-15615-00039  
Facility: Printing Press EU-11  
Parameter: VOC Input  
Limit: 6.2 tons per twelve 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: ~~Product Specialties, Inc.~~  
Source Address: ~~2073 McDonald Avenue, New Albany, Indiana 47150~~  
Mailing Address: ~~2073 McDonald Avenue, New Albany, Indiana 47150~~  
FESOP No.: ~~043-15615-00039~~  
Facility: ~~Printing Press EU-13~~  
Parameter: ~~VOC Input~~  
Limit: ~~4.66 tons VOC input per twelve consecutive month period with compliance determined at the end of each month~~

19. IDEM, OAQ has determined that once per day monitoring of visible emission notations and once per day of monitoring of the control device is generally sufficient to ensure proper operation of the control device. Therefore, Conditions D.1.10 and D.1.11 have been revised as follows:

#### D.1.10 Visible Emissions Notations

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- (a) Visible emission notations of plastic film mixing line (EU-5) baghouse stack exhaust shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- ...
- (f) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions is are observed, the Permittee shall take reasonable steps in accordance with Section C – Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

#### D.1.1211 Parametric Monitoring

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The Permittee shall record the ~~total static~~ pressure drop across each baghouse associated with the plastic film mixing line (EU-5), at least once per ~~working shift~~ **day** when each plastic film line is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge and Other Instrument Specifications~~, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

20. IDEM, OAQ has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit.

#### D.1.11 Baghouse Inspections

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~~An inspection shall be performed within the last month of each calendar quarter of all bags controlling the plastic film line (EU-5) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.~~

21. Paragraph (a) of the Broken or Failed Baghouse Condition D.1.12 (formerly D.1.13) has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.1.9 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

D.1.9 Particulate Matter (PM) Control [326 IAC 2-8-5(a)(4)]

- (a) In order to comply with D.1.1, the baghouses for PM control shall be in operation and control emissions from the silos (EU-1, and EU-2) and the plastic film mixing line (EU-5) at all times that the plastic film manufacturing is in operation.
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

Paragraph (b) of D.1.12 (formerly D.1.13) have been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM, OAQ is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

D.1.1312 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- (b) ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- (a) **For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

**Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.**

22. Condition D.1.13 (formerly D.1.14) - Record Keeping Requirements was updated as shown.

D.1.1413 Record Keeping Requirements

- 
- (a) To document compliance with Condition D.1.10, the Permittee shall maintain records of the visible emission notations of each plastic film line (EU-5) stack exhaust once per ~~shift~~ **day** and the visible emission notations performed during loading operations of the silos (EU-1 and EU-2).
- (b) To document compliance with Condition D.1.12, the Permittee shall maintain per ~~shift~~ **day** records of the ~~total static~~ pressure drop during normal operation for the plastic film mixing line (EU-5).
- (c) To document compliance with VOC and HAPs content and usage limits in Conditions D.1.2, D.1.3, and D.1.5 the Permittee shall maintain records in accordance with (1) through ~~(68)~~ below. Records maintained for (1) through ~~(68)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Conditions D.1.2, D.1.3, and D.1.5.
- ...
- (7) The total material compounded from extruders (identified as EU-6 and EU-7) per month.**
- (8) The yards of film produced by laminators (identified as EU-12 and EU-14) per month.**
- ~~(d) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11.~~
- (ed)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

23. The third sentence on the Quarterly Deviation and Compliance Monitoring report form has been changed as follows to be consistent with Condition B.15 Deviations from Permit Requirements and Conditions:

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. ~~Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

24. Condition A.1 has been revised to reflect changes in the attainment status of Floyd County for PM2.5.

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

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The Permittee owns and operates a plastic film manufacturing plant.

Authorized individual:	Vice President
Source Address:	2073 McDonald Avenue, New Albany, Indiana 47150
Mailing Address:	2073 McDonald Avenue, New Albany, Indiana 47150
General Source Phone:	(812) 945-0920
SIC Code:	3081
Source Location Status:	Floyd
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; <b>Emission Offset and New Source Review</b> Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

25. IDEM, OAQ has clarified the Permit Renewal condition as shown.

B.4718 Permit Renewal [326 IAC 2-8-3(h)]

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...

(b) ~~Timely Submittal of Permit Renewal [326 IAC 2-8-3]~~

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

(2) ~~If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.~~

(A1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B2) 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) ~~Right to Operate After Application for Renewal [326 IAC 2-8-9]~~

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, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

26. IDEM, OAQ has revised the Risk Management Plan pursuant to the provisions of 326 IAC 2-8-4 and 40 CFR 68 as shown.

C.4514 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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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.**~~is an applicable requirement and the Permittee shall submit:~~

(a) ~~A compliance schedule for meeting the requirements of 40 CFR 68; or~~

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

~~All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-11(1).~~

27. IDEM, OAQ has deleted condition B.1 – Permit No Defense because it is now included on the front page of the permit.

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

**Product Specialties, Inc.  
2073 McDonald Avenue  
New Albany, Indiana 47150**

(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.**

**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.**

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.

...

### **Conclusion**

This permit revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 043-22602-00039.