



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: November 9, 2006
RE: Rohm and Haas Chemicals, LLC / 085-22604-00085
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Rohm and Haas Chemical, LLC
1102 Leiter Drive
Warsaw, Indiana 46580**

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

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

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.: 085-22604-00085	
Original signed by	Issuance Date: November 9, 2006
Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date: November 9, 2011

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary powder coating manufacturing facility.

Authorized individual:	Keith Ort
Source Address:	1102 Leiter Drive, Warsaw, Indiana 46580
Mailing Address:	1102 Leiter Drive, Warsaw, Indiana 46580
General Source Phone:	(574) 372-2000
SIC Code:	2851
County Location	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD; Minor Source, Section 112 of the Clean Air Act; 1 of 28 Source Categories

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

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

- (a) One (1) Quality Control and Sample Testing Area, installed in 1978 and modified in 1999, with emissions controlled by a dust collection system identified as QC dust collection, with a maximum capacity of 4.2 lb of powder coating/hr, and exhausting to stacks QCN and QCS.
- (b) One (1) air classifying mill, identified as ACM-1, installed in 1978 and modified in 1999 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-1.
- (c) One (1) air classifying mill, identified as ACM-2, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-2.
- (d) One (1) air classifying mill, identified as ACM-3, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-3.
- (e) One (1) air classifying mill, identified as ACM-4, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-4.
- (f) One (1) air classifying mill, identified as ACM-5, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-5.

- (g) One (1) air classifying mill, identified as ACM-6, installed in 1978 and modified in 1997 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-6.
- (h) One (1) air classifying mill, identified as ACM-7, installed in 1993, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-7.
- (i) One (1) air classifying mill, identified as ACM-8, installed in 1993, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-8.
- (j) One (1) Weigh-up and Blending Area, installed in 1978 and modified in 1993, with a maximum throughput of 6,040 lb of powder coating/hr, including a pneumatic empty bag collection and compactor system, with emissions controlled by two dust cartridge filter systems exhausting to stacks WU-1 and WU-2.
- (k) One (1) Extrusion Area, constructed in 1978 and modified in 1993 and 1999, with a maximum throughput of 6,040 lb of powder coating/hr with emissions controlled by a dust collection system exhausting to stack EX.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) A 300,000 Btu/hr extruder blade burn-off incinerator; (326 IAC 4-2-2)
 - (2) Thirty-four (34) space heaters with a combined total heat capacity of 4.475 MMBtu/hr; and
 - (3) Two (2) water heaters with a combined total heat capacity of 0.151 MMBtu/hr.
- (b) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 gr/dscf and a gas flow rate less than or equal to 4000 acfm, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. (326 IAC 6-3-2)
- (c) Other activities or categories not previously identified which have the following Insignificant Thresholds: Lead (Pb) = 0.6 ton/year or 3.29 lbs/day; Carbon Monoxide (CO) = 25 lbs/day; Sulfur Dioxides (SO₂) = 5 lbs/hour or 25 lbs/day; Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day; Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day; and Volatile Organic compounds (VOC) = 3 lbs/hr or 15 lbs/day:
 - (1) Two (2) housekeeping vacuums identified as Hoffman Dust Collection System – East and Hoffman Dust Collection System – West; (326 IAC 6-3-2)
 - (2) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
- (d) Cleaners and solvents having a vapor pressure less than 15 mm Hg, or having a vapor pressure less than 5 mm Hg, the use of which does not exceed 145 gallons per year.
- (e) Closed loop cooling systems.

- (f) Operations using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) On-site fire and emergency response training approved by the department.

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) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

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

- (a) This permit, 085-22604-00085, is issued for a fixed term of five (5) years from the Issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

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

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

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "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.8 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan 326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1-1(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.12 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 and the Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ

Telephone 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

and

Northern Regional Office

220 W. Colfax Avenue, Suite 200

South Bend, IN 46601-1634

Telephone: (574) 245-4870 or (800) 753-5519

Fax: (574) 245-4877

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

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

- (a) All terms and conditions of permits established prior to F085-22604-00085 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.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

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 an "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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "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 an "authorized individual" as defined by 326 IAC 2-1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 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 being 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 an "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 emissions trades that are subject to 326 IAC 2-8-15(b) through (d). 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 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 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][IC13-30-3-1]

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

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

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change 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 317-233-4230 (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 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

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

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

C.9 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented 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.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

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

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

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

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

The response action documents submitted pursuant to this condition do require the certification by an "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]

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported.

This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC2-1.1-1(1).

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

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "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 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) One (1) Quality Control and Sample Testing Area, installed in 1978 and modified in 1999, with emissions controlled by a dust collection system identified as QC dust collection, with a maximum capacity of 4.2 lb of powder coating/hr, and exhausting to stacks QCN and QCS.
- (b) One (1) air classifying mill, identified as ACM-1, installed in 1978 and modified in 1999 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-1.
- (c) One (1) air classifying mill, identified as ACM-2, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-2.
- (d) One (1) air classifying mill, identified as ACM-3, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-3.
- (e) One (1) air classifying mill, identified as ACM-4, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-4.
- (f) One (1) air classifying mill, identified as ACM-5, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-5.
- (g) One (1) air classifying mill, identified as ACM-6, installed in 1978 and modified in 1997 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-6.
- (h) One (1) air classifying mill, identified as ACM-7, installed in 1993, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-7.
- (i) One (1) air classifying mill, identified as ACM-8, installed in 1993, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-8.
- (j) One (1) Weigh-up and Blending Area, installed in 1978 and modified in 1993, with a maximum throughput of 6,040 lb of powder coating/hr, including a pneumatic empty bag collection and compactor system, with emissions controlled by two dust cartridge filter systems exhausting to stacks WU-1 and WU-2.
- (k) One (1) Extrusion Area, constructed in 1978 and modified in 1993 and 1999, with a maximum throughput of 6,040 lb of powder coating/hr with emissions controlled by a dust collection system exhausting to stack EX.

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

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

D.1.1 FESOP PM10 Limit [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, PM10 emissions shall not exceed the limits as provided in the table below. Compliance with these limits is equivalent to PM10 emissions for the entire source of less

than 100 tons per year and will render the requirements of 326 IAC 2-2 and 326 IAC 2-7 not applicable.

Emission Unit	PM10 Emissions Limitations (lbs/hour)
ACM-1	0.38
ACM-2	0.38
ACM-3	0.38
ACM-4	0.38
ACM-5	0.38
ACM-6	0.38
ACM-7	0.38
ACM-8	0.38
Weigh-up and Blending Area	0.078
Extrusion Area	0.048
Quality Control and Sample Testing Area	0.020

D.1.2 PSD Minor Limit [326 IAC 2-2]

The emission units identified as ACM-1, ACM-2, ACM-3, ACM-4, ACM-5, ACM-6, ACM-7, ACM-8, Weigh-up and Blending Area, Extrusion Area, and Quality Control and Sample Testing Area shall not exceed the limits provided in the table below. Compliance with these limitations renders the requirements of 326 IAC 2-2, Prevention of Significant Deterioration not applicable.

Emission Unit	Allowable PM Emissions (tons/year)
ACM-1	1.64
ACM-2	1.64
ACM-3	1.64
ACM-4	1.64
ACM-5	1.64
ACM-6	1.64
ACM-7	1.64
ACM-8	1.64
Weigh-up and Blending Area	0.34
Extrusion Area	0.21
Quality Control and Sample Testing Area	0.09

D.1.3 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from ACM-1 through ACM-8, the weigh-up and blending area, and the extrusion area shall be limited to the emission rates shown in the table below. These emission limits are calculated using 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:

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

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

Unit	Process Weight Rate (ton/yr)	Particulate Emission Rate (lb/hr)
ACM-1	1.25	4.76
ACM-2	1.25	4.76
ACM -3	1.25	4.76
ACM-4	1.25	4.76
ACM-5	1.25	4.76
ACM-6	1.25	4.76
ACM-7	1.25	4.76
ACM-8	1.25	4.76
Weigh-up and Blending Area	3.02	8.6
Extrusion Area	3.02	8.6

- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emission from the Quality Control and Sample Testing Area shall not exceed 0.551 pounds per hour.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventative Maintenance Plan in accordance with Section B – Preventative Maintenance Plan, of this permit, is required for the air classifying mills identified as ACM-1 through ACM-8, the Weigh-up and Blending Area, Extrusion Area, and the associated dust cartridge filters.

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

- (a) In order to comply with conditions D.1.1, D.1.2, and D.1.3:
- (1) The dust cartridge filters and baghouse for PM and PM10 control shall be in operation and control emissions at all times that the listed units are in operation.
 - (2) The cyclones used for product collection shall be in operation and control PM and PM10 emissions at all times that the air classifying mills are in operation.

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

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the stack exhaust from S-ACM-1, S-ACM-2, S-ACM-3, S-ACM-4, S-ACM-5, S-ACM-6, S-ACM-7, S-ACM-8, WU-1, WU-2, EX, QCN, and QCS 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) 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.
- (c) 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.
- (d) 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.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response 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.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across each dust cartridge filter and baghouse used in conjunction with ACM-1 through ACM-8, the Weigh-up and Blending area, Extrusion Area, and the Quality Control and Sample Testing Area, at least once per day when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the cartridge filters and 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 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.1.8 Cartridge Filter or Baghouse Failure Detection

- (a) For a cartridge filter and 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 cartridge filter and baghouse controlling emissions from a batch process, the feed to the process 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).

Baghouse or cartridge filter failure can be indicated by a significant drop in 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.

D.1.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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). Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of stack exhaust once per day.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain once per day records the pressure drop across each cartridge filter and baghouse.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) A 300,000 Btu/hr extruder blade burn-off incinerator; (326 IAC 4-2-2)
- (b) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 gr/dscf and a gas flow rate less than or equal to 4000 acfm, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. (326 IAC 6-3-2)
- (c) Other activities or categories not previously identified which have the following Insignificant Thresholds: Lead (Pb) = 0.6 ton/year or 3.29 lbs/day; Carbon Monoxide (CO) = 25 lbs/day; Sulfur Dioxides (SO₂) = 5 lbs/hour or 25 lbs/day; Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day; Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day; and Volatile Organic compounds (VOC) = 3 lbs/hr or 15 lbs/day:
 - (1) Two (2) housekeeping vacuums identified as Hoffman Dust Collection System – East and Hoffman Dust Collection System – West; (326 IAC 6-3-2)
 - (2) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.

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

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

D.2.1 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), the 300,000 Btu/hr extruder blade burn-off incinerator shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators.

If any of the above requirements are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the Grinding and Machinery Operations, and the two housekeeping vacuums identified as Hoffman Dust Collection System – East and Hoffman Dust Collection System – West, which each have a process weight rate less than one hundred (100) pound per hour, shall not exceed 0.551 pound per hour.

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

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

Source Name: Rohm and Haas Chemical, LLC
Source Address: 1102 Leiter Drive, Warsaw, Indiana 46580
Mailing Address: 1102 Leiter Drive, Warsaw, Indiana 46580
FESOP Permit No.: F085-22604-00085

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Rohm and Haas Chemical, LLC
Source Address: 1102 Leiter Drive, Warsaw, Indiana 46580
Mailing Address: 1102 Leiter Drive, Warsaw, Indiana 46580
FESOP Permit No.: 085-22604-00085

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

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

Source Name: Rohm and Haas Chemical, LLC
 Source Address: 1102 Leiter Drive, Warsaw, Indiana 46580
 Mailing Address: 1102 Leiter Drive, Warsaw, Indiana 46580
 FESOP Permit No.: 085-22604-00085

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Rohm and Haas Chemical, LLC
Source Location:	1102 Leiter Drive, Warsaw, Indiana 46580
County:	Kosciusko
SIC Code:	2851
Operation Permit No.:	F085-12589-00085
Operation Permit Issuance Date:	November 26, 2001
Permit Renewal No.:	F085-22604-00085
Permit Reviewer:	ERG/JR

The Office of Air Quality (OAQ) has reviewed a FESOP Renewal application from Rohm and Haas Chemical, LLC relating to the operation of a powder coating manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Quality Control and Sample Testing Area, installed in 1978 and modified in 1999, with emissions controlled by a dust collection system identified as QC dust collection, with a maximum capacity of 4.2 lb of powder coating/hr, and exhausting to stacks QCN and QCS.
- (b) One (1) air classifying mill, identified as ACM-1, installed in 1978 and modified in 1999 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-1.
- (c) One (1) air classifying mill, identified as ACM-2, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-2.
- (d) One (1) air classifying mill, identified as ACM-3, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-3.
- (e) One (1) air classifying mill, identified as ACM-4, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-4.
- (f) One (1) air classifying mill, identified as ACM-5, installed in 1978 and modified in 1998 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-5.

- (g) One (1) air classifying mill, identified as ACM-6, installed in 1978 and modified in 1997 and 2001, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-6.
- (h) One (1) air classifying mill, identified as ACM-7, installed in 1993, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-7.
- (i) One (1) air classifying mill, identified as ACM-8, installed in 1993, with a maximum capacity of 2,500 lb of powder coating/hr, equipped with a product collection cyclone and a dust cartridge filter system, and exhausting to stack S-ACM-8.
- (j) One (1) Weigh-up and Blending Area, installed in 1978 and modified in 1993, with a maximum throughput of 6,040 lb of powder coating/hr, including a pneumatic empty bag collection and compactor system, with emissions controlled by two dust cartridge filter systems exhausting to stacks WU-1 and WU-2.
- (k) One (1) Extrusion Area, constructed in 1978 and modified in 1993 and 1999, with a maximum throughput of 6,040 lb of powder coating/hr with emissions controlled by a dust cartridge filter system exhausting to stack EX.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) A 300,000 Btu/hr extruder blade burn-off incinerator; (326 IAC 4-2-2)
 - (2) Thirty-four (34) space heaters with a combined total heat capacity of 4.475 MMBtu/hr; and
 - (3) Two (2) water heaters with a combined total heat capacity of 0.151 MMBtu/hr.
- (b) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 gr/dscf and a gas flow rate less than or equal to 4000 acfm, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. (326 IAC 6-3-2)
- (c) Other activities or categories not previously identified which have the following Insignificant Thresholds: Lead (Pb) = 0.6 ton/year or 3.29 lbs/day; Carbon Monoxide (CO) = 25 lbs/day; Sulfur Dioxides (SO₂) = 5 lbs/hour or 25 lbs/day; Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day; Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day; and Volatile Organic compounds (VOC) = 3 lbs/hr or 15 lbs/day:
 - (1) Two (2) housekeeping vacuums identified as Hoffman Dust Collection System – East and Hoffman Dust Collection System – West; (326 IAC 6-3-2)
 - (2) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
- (d) Cleaners and solvents having a vapor pressure less than 15 mm Hg, or having a vapor pressure less than 5 mm Hg, the use of which does not exceed 145 gallons per year.

- (e) Closed loop cooling systems.
- (f) Operations using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) On-site fire and emergency response training approved by the department.

Existing Approvals

The source has been operating under F085-12589-00085, issued on November 26, 2001, and the following previous approvals:

Administrative Amendment 085-19997-00085, issued on January 19, 2005.

All terms and conditions of previous permits were incorporated into this FESOP Renewal.

Air Pollution Control Justification as an Integral Part of the Process

During the preparation of the source's original FESOP, IDEM, OAQ reviewed the following justifications for the cyclones and baghouses which are installed in series:

- (a) The company submitted the following justification for the cyclones used in the eight air classifying mills:

The cyclones are used to capture ninety-five percent (95%) of powder coating products. Without these cyclones, the source's product would all be wasted.

IDEM, OAQ evaluated this justification and agreed that the product collection cyclones on each of the eight air classifying mills should be considered as an integral part of the powder coating manufacturing process. Therefore, the permitting level was determined using the potential to emit after the product collection cyclones. Operating conditions in the proposed permit will specify that these product collection cyclones shall operate at all times when the powder coating manufacturing process is in operation.

- (b) The company also submitted the following justification that the dust cartridge filters on each of the eight air classifying mills be considered as an integral part of the powder coating manufacturing process:
 - (1) The dust cartridge filters are used to collect the fines not collected by the product collection cyclones. These fines are sometimes used as an input to the production of a specialized product and sometimes the fines collected are discarded.
 - (2) The dust cartridge filters were initially installed to serve the primary purpose of product collection but were replaced by the product collection cyclones to facilitate better product homogeneity.
 - (3) The dust cartridge filters collect approximately 5% of the overall powder material generated from the eight air classifying mills.

IDEM, OAQ evaluated this justification and determined that the dust cartridge filters on each of the eight air classifying mills are not an integral part of the powder coating manufacturing process because there is no over-whelming economic incentive to use them. Therefore, the permitting level was determined using the potential to emit before the dust cartridge filters.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

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

Emission Calculations

The calculations from the initial FESOP F085-12589-00085 have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 5).

Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	>100
PM-10	>100
SO ₂	Negligible
VOC	Negligible
CO	Negligible
NO _x	Negligible

HAPs	Unrestricted Potential Emissions (tons/year)
Antimony Compounds	<10
Nickel Compounds	<10
Chromium Compounds	<10
Manganese Compounds	<10
Cobalt Compounds	<10
Copper Compounds	<10
Total	<25

- (a) The unrestricted potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 is equal to or greater than 100 tons per year. This source that would otherwise be subject to the provisions of 326 IAC 2-7, agreed to limit PM10 emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 (Chemical Plant operating under SIC 2851), the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability.

Potential to Emit After Issuance

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

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
ACM-1	2.74 ⁽¹⁾	1.64 ⁽²⁾	0	0	0	0	1.84E ⁻⁴
ACM-2	2.74 ⁽¹⁾	1.64 ⁽²⁾	0	0	0	0	1.84E ⁻⁴
ACM-3	2.74 ⁽¹⁾	1.64 ⁽²⁾	0	0	0	0	1.84E ⁻⁴
ACM-4	2.74 ⁽¹⁾	1.64 ⁽²⁾	0	0	0	0	1.84E ⁻⁴
ACM-5	2.74 ⁽¹⁾	1.64 ⁽²⁾	0	0	0	0	1.84E ⁻⁴
ACM-6	2.74 ⁽¹⁾	1.64 ⁽²⁾	0	0	0	0	1.84E ⁻⁴
ACM-7	2.74 ⁽¹⁾	1.64 ⁽²⁾	0	0	0	0	1.83E ⁻⁴
ACM-8	2.74 ⁽¹⁾	1.64 ⁽²⁾	0	0	0	0	1.83E ⁻⁴
Weigh-up and Blending Area	0.34 ⁽¹⁾	0.34 ⁽²⁾	0	0	0	0	2.83E ⁻³
Extruder Area	0.21 ⁽¹⁾	0.21 ⁽²⁾	0	0	0	0	1.77E ⁻³
Quality Control and Sample Testing Area	0.09 ⁽¹⁾	0.09 ⁽²⁾	0	0	0	0	7.36E ⁻⁴
Insignificant Activities ⁽³⁾	0.2	0.2	Negligible	Negligible	1.7	Negligible	Negligible
Total Emissions	22.8	14.0	0	0	1.7	0	6.80E ⁻³

⁽¹⁾ Based on PSD minor limits.

⁽²⁾ Based on FESOP limits.

⁽³⁾ Emissions from the Insignificant Natural gas-fired combustion sources (a total heat capacity of 4.626 MMBtu/hr) are below 0.1 for SO₂, VOC, NO_x, and HAPs.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Kosciusko County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10

emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.

- (b) Volatile organic compounds (VOC) and Nitrogen Oxides 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_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	22.8
PM-10	14.0
SO ₂	Negligible
VOC	Negligible
CO	1.7
NO _x	Negligible
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source because even though it is one of the 28 listed source categories, it does not emit 100 tons per year or greater of any regulated pollutant.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12 and 40 CFR 60) included in this permit for this source.
 - (1) The requirements of 40 CFR 60, Subpart E, Standards of Performance for Incinerators (326 IAC 12) are not included in this permit for the 300,000 Btu/hr extruder blade burn-off incinerator because the incinerator has a solid waste charge rate of less than 45 metric tons per day.
 - (2) The requirements of 40 CFR 60, Subpart CCCC, Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001 (326 IAC 12) are not included in this permit for the 300,000 Btu/hr extruder blade burn-off incinerator because the incinerator was constructed before November 30, 1999. In addition, the incinerator is used to clean/burn off material (residual powder) on the extruder screws and pursuant to 40 CFR 60.2020(k), rack, part, and drum reclamation units as defined in 40 CFR 60.2020(k) are exempt from this rule.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit for this source.
 - (1) The requirements of 40 CFR 63, Subpart HHHHH - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing (326 IAC 20)

are not included in this permit. The source is not a major source of hazardous air pollutants (HAP) emissions.

State Rule Applicability – Entire Source

326 IAC 2-2 (PSD)

This source was initially constructed prior to the promulgation of the PSD rules, but was modified in the late 1990s and in 2001. This source operates under the Standard Industrial Classification (SIC) Code 2851 and therefore, belongs to the chemical plant source category in 326 IAC 2-2-1(gg)(1). The uncontrolled potential to emit PM and PM10 for this source exceeds the 100 tons per year major source threshold. This source has always used control devices (cyclones and baghouses) to control the particulate emissions. Currently, the potential to emit PM and PM10 after controls is less than 23 tons per year of PM and 14 tons per year of PM10. During the preparation of the original FESOP, the source agreed to limit PM and PM10 emissions to less than 100 tons per year, thereby, making the source a minor source under 326 IAC 2-2. This also limited the modifications in the late 1990s and 2001 to minor levels such that they are not subject to the requirements of 326 IAC 2-2. The PM₁₀ limits are the same as those for the FESOP limits and are discussed below in the section titled 326 IAC 2-8 (FESOP). The PM limits are as follows:

Emission Unit	Stack ID	Allowable PM Emissions (tons/year)
ACM-1	S-ACM-1	1.64
ACM-2	S-ACM-2	1.64
ACM-3	S-ACM-3	1.64
ACM-4	S-ACM-4	1.64
ACM-5	S-ACM-5	1.64
ACM-6	S-ACM-6	1.64
ACM-7	S-ACM-7	1.64
ACM-8	S-ACM-8	1.64
Weigh-up and Blending Area	WU-1 and WU-2	0.34
Extrusion Area	EX	0.21
Quality Control and Sample Testing Area	QCN and QCS	0.09

The source will use the internal cyclones and the cartridge filter systems to comply with these limitations.

326 IAC 2-4.1 (New Source Toxics Control)

This source did not undergo a construction or a reconstruction of a major HAP source after July 27, 1997. Therefore, this source is not subject to 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program), it is located in Kosciusko County, and it does not emit lead into the ambient air at 5 tpy or greater. The Permittee shall continue to be limited pursuant to the provisions of 326 IAC 2-8 (FESOP). Therefore, the provisions of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

The source has a potential to emit PM10 that is above the Title V applicability threshold. However, emissions are limited to less than the Title V applicability threshold pursuant to 326 IAC 2-8-4.

Pursuant to 326 IAC 2-8-4, PM10 emissions shall not exceed the limits as provided in the table below. Compliance with these limits is equivalent to PM10 emissions for the entire source of less than 100 tons per year and will render the requirements of 326 IAC 2-7 not applicable. The source will be in compliance with these limitations by controlling PM10 emissions with the product collection cyclones and the dust cartridge filters, in series.

Emission Unit	Stack ID	PM10 Emissions Limitations (lbs/hr)
ACM-1	S-ACM-1	0.38
ACM-2	S-ACM-2	0.38
ACM-3	S-ACM-3	0.38
ACM-4	S-ACM-4	0.38
ACM-5	S-ACM-5	0.38
ACM-6	S-ACM-6	0.38
ACM-7	S-ACM-7	0.38
ACM-8	S-ACM-8	0.38
Weigh-up and Blending Area	WU-1 and WU-2	0.078
Extrusion Area	EX	0.048
Quality Control and Sample Testing Area	QCN and QCS	0.020

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5-1(a), this rule does not apply to this source because it is not located in a nonattainment area for particulate matter. Pursuant to 326 IAC 6-5-1(b), this rule does not apply to this source because fugitive particulate emissions are expected to be minimal for all emission units constructed after December 13, 1985.

State Rule Applicability – ACM-1, ACM-2, ACM-3, ACM-4, ACM-5, ACM-6, ACM-7, ACM-8, Weigh-up and Blending Area, Extrusion Area, and Quality Control and Sample Testing Area

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

- (a) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the emission units listed in the table below shall not exceed the emission rate calculated using the following equation:

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

and $P = \text{process weight rate in tons per hour}$

The following table sets forth the current maximum process weight rate for specific emission units and the allowable rate of emissions calculated for that process weight rate.

Emission Unit	Maximum Process Weight Rate (tons/hr)	E = Calculated Emission Rate Limitation (lb/hr)
ACM-1	1.25	4.76
ACM-2	1.25	4.76
ACM -3	1.25	4.76
ACM-4	1.25	4.76
ACM-5	1.25	4.76
ACM-6	1.25	4.76
ACM-7	1.25	4.76
ACM-8	1.25	4.76
Weigh-up and Blending Area	3.02	8.6
Extrusion Area	3.02	8.6

- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the quality control and sample testing area which has a process weight rate of less than 100 lb/hrs shall not exceed 0.551 pounds per hour.

The product collection cyclones and the dust cartridge filters shall be in operation at all times that the listed equipment are in operation in order to comply with these emission limits.

State Rule Applicability – Insignificant Activities

326 IAC 4-2-2 (Incinerators)

The Permittee is subject to the requirements of 326 IAC 4-2-2 (Incinerators) because the 300,000 Btu/hr extruder blade burn-off incinerator is used to clean/burn off material (residual powder) stuck on the extruder screws. Pursuant to 326 IAC 4-2-2 (Incinerators), the 300,000 Btu/hr extruder blade burn-off incinerator shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators.

If any of the above requirements are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the Grinding and Machinery Operations and the two housekeeping vacuums, identified as Hoffman Dust Collection System – East and Hoffman Dust Collection System – West which each have a process weight rate less than one hundred (100) pound per hour, shall not exceed 0.551 pound per hour.

326 IAC 11-8 (Commercial and Industrial Solid Waste Incineration Units)

Pursuant to 326 IAC 11-8, the Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units that Commenced Construction On or Before November 30, 1999 [40 CFR 60, Subpart DDDD] are not applicable to the 300,000 Btu/hr extruder blade burn-off incinerator. The incinerator is used to clean/burn off material (residual powder) on the extruder screws and pursuant to 326 IAC 11-8-1(10), rack, part, and drum reclamation units as defined in 40 CFR 60.2785 are exempt from this rule.

Testing Requirements

Although several emission units are subject to PM and PM10 emission limitations and use control devices to comply with those limits, no stack testing has been required in this FESOP renewal because each emission unit is responsible for generating only a small proportion of the before controls potential PM and PM10 emissions.

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 follows:

1. The ACM-1 through ACM-8, the Weigh-up and Blending Area, Extrusion Area, and Quality Control and Sample Testing Area have applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts S-ACM-1, S-ACM-2, S-ACM-3, S-ACM-4, S-ACM-5, S-ACM-6, S-ACM-7, S-ACM-8, WU-1, WU-2, EX, QCN, and OCS 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) 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.
- (c) 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.
- (d) 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.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response 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.

Parametric Monitoring

The Permittee shall record the pressure drop across each dust cartridge filter used in conjunction with ACM-1 through ACM-8, the Weigh-up and Blending Area, Extrusion Area, and the Quality Control and Sample Testing Area, at least once per day when the processes are in operation when venting to the atmosphere. 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 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.

Broken or Failed Bag Detection

- (a) For a cartridge filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed units 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 cartridge filter controlling emissions from a batch process, the feed to the process 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).

Cartridge filter 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.

- (c) In the event that cyclone failure has been observed: 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). Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the cyclones and dust cartridge filters associated with the processes must operate properly to ensure compliance with 326 IAC 2-8 (FESOP), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this powder coating manufacturing facility shall be subject to the conditions of the FESOP 085-22604-00085.

Appendix A: Emissions Calculations
 Particulate Emission Calculations

Company Name: Rohm and Haas Chemical, LLC
 Address: 1102 Leiter Drive, Warsaw, Indiana, 46580
 FESOP Permit: 085-22604-00085
 Reviewer: ERG/JR
 Date: May 11, 2006

Emission Unit	Old Maximum Capacity (lb/hr)	Cyclone Separation Efficiency (%)	Fines to Cartridge Filter (lb/hr)	New Maximum Capacity after 2001 Modification (lb/hr)	Fines to Cartridge Filter @ 2500 lb/hr (lb/hr)	Potential to Emit PM (ton/yr)	Portion of PM that is PM10 (%)	Potential to Emit PM10 (ton/yr)	Control Efficiency (%)	Controlled Potential to Emit PM (ton/yr)	Controlled Potential to Emit PM10 (ton/yr)
ACM-1	2,000	95%	100	2,500	125	548	60%	329	99.5%	2.74	1.64
ACM-2	2,000	95%	100	2,500	125	548	60%	329	99.5%	2.74	1.64
ACM-3	2,000	95%	100	2,500	125	548	60%	329	99.5%	2.74	1.64
ACM-4	2,000	95%	100	2,500	125	548	60%	329	99.5%	2.74	1.64
ACM-5	2,000	95%	100	2,500	125	548	60%	329	99.5%	2.74	1.64
ACM-6	2,000	95%	100	2,500	125	548	60%	329	99.5%	2.74	1.64
ACM-7	2,500	95%	125	2,500	125	548	60%	329	99.5%	2.74	1.64
ACM-8	2,500	95%	125	2,500	125	548	60%	329	99.5%	2.74	1.64
weigh-up and blending area			7.69		7.69	33.7	100%	33.7	99.0%	0.34	0.34
extrusion area			4.90		4.90	21.5	100%	21.5	99.0%	0.21	0.21
quality control and sample testing area			2.10		2.10	9.20	100%	9.20	99.0%	0.09	0.09
Total						4,440		2,690		22.5	13.8

Methodology

Fines to Cartridge Filter @ 2500 lb/hr (lb/hr) = Fines to Cartridge Filter (lb/hr) / Old Average Rate (lb/hr) x New Maximum Capacity after 2001 Modification (lb/hr)

Potential to Emit PM (ton/yr) = Fines to Cartridge Filter @ 2500 lb/hr (lb/hr) x 8760 hr/yr x 1 ton/2000 lbs

Potential to Emit PM10 (ton/yr) = Potential to Emit PM (ton/yr) x Portion of PM that is PM10 (%)

Controlled Potential to Emit PM/PM10 (ton/yr) = Potential to Emit PM/PM10 (ton/yr) x (1- Control Efficiency (%))

Company Name: Rohm and Haas Chemical, LLC
Address: 1102 Leiter Drive, Warsaw, Indiana, 46580
FESOP Permit: 085-22604-00085
Reviewer: ERG/JR
Date: May 11, 2006

Emission Unit	Pollutant	Max Rate of Fines Collected @ 2000 lb/hr (ton/hr)	Control Efficiency (%)	*Max rate of fines @ 2000 lb/hr (ton/hr)	Emission Factor (lb/ton)	Max Uncontrolled PTE @ 2000 lb/hr (tons/yr)	Max Controlled PTE @ 2000 lb/hr (ton/yr)	Max Uncontrolled PTE @ 2500 lb/hr (ton/yr)	Max Controlled PTE @ 2500 lb/hr (ton/yr)
ACM-1	Antimony	1.05E-02	99.9	0.0105	6.03	0.28	2.78E-04	0.35	3.47E-04
ACM-1	Nickel	1.05E-02	99.9	0.0105	5.22	0.24	2.40E-04	0.30	3.01E-04
ACM-1	Chromium	1.05E-02	99.9	0.0105	1.41	0.06	6.48E-05	0.08	8.10E-05
ACM-1	Manganese	1.05E-02	99.9	0.0105	3.40E-03	1.57E-04	1.57E-07	1.96E-04	1.96E-07
ACM-1	Cobalt	1.05E-02	99.9	0.0105	0.51	0.02	2.32E-05	0.03	2.91E-05
ACM-1	Copper	1.05E-02	99.9	0.0105	0.14	0.01	6.58E-06	0.01	8.23E-06
ACM-2	Antimony	1.05E-02	99.9	0.0105	6.03	0.28	2.78E-04	0.35	3.47E-04
ACM-2	Nickel	1.05E-02	99.9	0.0105	5.22	0.24	2.40E-04	0.30	3.01E-04
ACM-2	Chromium	1.05E-02	99.9	0.0105	1.41	0.06	6.48E-05	0.08	8.10E-05
ACM-2	Manganese	1.05E-02	99.9	0.0105	3.40E-03	1.57E-04	1.57E-07	1.96E-04	1.96E-07
ACM-2	Cobalt	1.05E-02	99.9	0.0105	0.51	0.02	2.32E-05	0.03	2.91E-05
ACM-2	Copper	1.05E-02	99.9	0.0105	0.14	0.01	6.58E-06	0.01	8.23E-06
ACM-3	Antimony	1.05E-02	99.9	0.0105	6.03	0.28	2.78E-04	0.35	3.47E-04
ACM-3	Nickel	1.05E-02	99.9	0.0105	5.22	0.24	2.40E-04	0.30	3.01E-04
ACM-3	Chromium	1.05E-02	99.9	0.0105	1.41	0.06	6.48E-05	0.08	8.10E-05
ACM-3	Manganese	1.05E-02	99.9	0.0105	3.40E-03	1.57E-04	1.57E-07	1.96E-04	1.96E-07
ACM-3	Cobalt	1.05E-02	99.9	0.0105	0.51	0.02	2.32E-05	0.03	2.91E-05
ACM-3	Copper	1.05E-02	99.9	0.0105	0.14	0.01	6.58E-06	0.01	8.23E-06
ACM-4	Antimony	1.05E-02	99.9	0.0105	6.03	0.28	2.78E-04	0.35	3.47E-04
ACM-4	Nickel	1.05E-02	99.9	0.0105	5.22	0.24	2.40E-04	0.30	3.01E-04
ACM-4	Chromium	1.05E-02	99.9	0.0105	1.41	0.06	6.48E-05	0.08	8.10E-05
ACM-4	Manganese	1.05E-02	99.9	0.0105	3.40E-03	1.57E-04	1.57E-07	1.96E-04	1.96E-07
ACM-4	Cobalt	1.05E-02	99.9	0.0105	0.51	0.02	2.32E-05	0.03	2.91E-05
ACM-4	Copper	1.05E-02	99.9	0.0105	0.14	0.01	6.58E-06	0.01	8.23E-06
Total						2.45	0.002	3.06	0.003

*Max rate of fines is calculated as max rate of fines collected divided by the efficiency of the cartridge filter.
Emission factors are calculated by the source to be the ratio of the metal compound utilized in the mixture to the total raw materials utilized.

Methodology

Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) = Max Rate of Fines @ 2000 lb/hr (ton/hr) x Emission Factor (lb/ton) x 8760 hr/yr x 1 ton/2000 lbs
 Max Controlled PTE @ 2000 lb/hr (tons/yr) = Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) x (1-Control Efficiency (%))
 Max Uncontrolled PTE @ 2500 lb/hr (ton/yr) = Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) x 2500 (lb/hr) / 2000 (lb/hr)
 Max Controlled PTE @ 2500 lb/hr (ton/yr) = Max Controlled PTE @ 2000 lb/hr (tons/yr) x 2500 (lb/hr) / 2000 (lb/hr)

Company Name: Rohm and Haas Chemical, LLC
Address: 1102 Leiter Drive, Warsaw, Indiana, 46580
FESOP Permit: 085-22604-00085
Reviewer: ERG/JR
Date: May 11, 2006

Emission Unit	Pollutant	Max Rate of Fines Collected (ton/hr)	Control Efficiency (%)	*Max rate of fines Calculated (ton/hr)	Emission Factor (lb/ton)	Max Uncontrolled PTE @ 2000 lb/hr (tons/yr)	Max Controlled PTE @ 2000 lb/hr (ton/yr)	Max Uncontrolled PTE @ 2500 lb/hr (ton/yr)	Max Controlled PTE @ 2500 lb/hr (ton/yr)
ACM-5	Antimony	1.05E-02	99.9	1.05E-02	6.03	0.28	2.78E-04	0.35	3.47E-04
ACM-5	Nickel	1.05E-02	99.9	1.05E-02	5.22	0.24	2.40E-04	0.30	3.01E-04
ACM-5	Chromium	1.05E-02	99.9	1.05E-02	1.41	0.06	6.48E-05	0.08	8.10E-05
ACM-5	Manganese	1.05E-02	99.9	1.05E-02	3.40E-03	1.57E-04	1.57E-07	1.96E-04	1.96E-07
ACM-5	Cobalt	1.05E-02	99.9	1.05E-02	0.51	0.02	2.32E-05	0.03	2.91E-05
ACM-5	Copper	1.05E-02	99.9	1.05E-02	0.14	0.01	6.58E-06	0.01	8.23E-06
ACM-6	Antimony	1.05E-02	99.9	1.05E-02	6.03	0.28	2.78E-04	0.35	3.47E-04
ACM-6	Nickel	1.05E-02	99.9	1.05E-02	5.22	0.24	2.40E-04	0.30	3.01E-04
ACM-6	Chromium	1.05E-02	99.9	1.05E-02	1.41	0.06	6.48E-05	0.08	8.10E-05
ACM-6	Manganese	1.05E-02	99.9	1.05E-02	3.40E-03	1.57E-04	1.57E-07	1.96E-04	1.96E-07
ACM-6	Cobalt	1.05E-02	99.9	1.05E-02	0.51	0.02	2.32E-05	0.03	2.91E-05
ACM-6	Copper	1.05E-02	99.9	1.05E-02	0.14	0.01	6.58E-06	0.01	8.23E-06
ACM-7	Antimony	1.31E-02	99.9	1.31E-02	6.03			0.35	3.46E-04
ACM-7	Nickel	1.31E-02	99.9	1.31E-02	5.22			0.30	3.00E-04
ACM-7	Chromium	1.31E-02	99.9	1.31E-02	1.41			0.08	8.08E-05
ACM-7	Manganese	1.31E-02	99.9	1.31E-02	3.40E-03			1.95E-04	1.95E-07
ACM-7	Cobalt	1.31E-02	99.9	1.31E-02	0.51			0.03	2.90E-05
ACM-7	Copper	1.31E-02	99.9	1.31E-02	0.14			0.01	8.21E-06
ACM-8	Antimony	1.31E-02	99.9	1.31E-02	6.03			0.35	3.46E-04
ACM-8	Nickel	1.31E-02	99.9	1.31E-02	5.22			0.30	3.00E-04
ACM-8	Chromium	1.31E-02	99.9	1.31E-02	1.41			0.08	8.08E-05
ACM-8	Manganese	1.31E-02	99.9	1.31E-02	3.40E-03			1.95E-04	1.95E-07
ACM-8	Cobalt	1.31E-02	99.9	1.31E-02	0.51			0.03	2.90E-05
ACM-8	Copper	1.31E-02	99.9	1.31E-02	0.14			0.01	8.21E-06
Total								3.06	0.003

*Max rate of fines is calculated as max rate of fines collected divided by the efficiency of the cartridge filter.

Max rate of fines collected and calculated for ACM-5 and ACM-6 are for 2000 lb/hr

Max rate of fines collected and calculated for ACM-7 and ACM-8 are for 2500 lb/hr

Emission factors are calculated by the source to be the ratio of the metal compound utilized in the mixture to the total raw materials utilized.

Methodology

Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) = Max Rate of Fines @ 2000 lb/hr (ton/hr) x Emission Factor (lb/ton) x 8760 hr/yr x 1 ton/2000 lbs

Max Controlled PTE @ 2000 lb/hr (tons/yr) = Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) x (1-Control Efficiency (%))

Max Uncontrolled PTE @ 2500 lb/hr (ton/yr) = Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) x 2500 (lb/hr) / 2000 (lb/hr)

Max Controlled PTE @ 2500 lb/hr (ton/yr) = Max Controlled PTE @ 2000 lb/hr (tons/yr) x 2500 (lb/hr) / 2000 (lb/hr)

Max Uncontrolled PTE ACM-7, ACM-8 (tons/yr) = Max Rate of Fines @ 2000 lb/hr (ton/hr) x Emission Factor (lb/ton) x 8760 hr/yr x 1 ton/2000 lbs

Max Controlled PTE ACM-7, ACM-8 (tons/yr) = Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) x (1-Control Efficiency (%))

Appendix A: Emissions Calculations
HAP Emissions

Company Name: Rohm and Haas Chemical, LLC
Address: 1102 Leiter Drive, Warsaw, Indiana, 46580
FESOP Permit: 085-22604-00085
Reviewer: ERG/JR
Date: May 11, 2006

Emission Unit	Pollutant	Max Rate of Fines Collected @ 2000 lb/hr (ton/hr)	Control Efficiency (%)	*Max rate of fines @ 2000 lb/hr (ton/hr)	Emission Factor (lb/ton)	Max Uncontrolled PTE @ 2000 lb/hr (tons/yr)	Max Controlled PTE @ 2000 lb/hr (ton/yr)	Max Uncontrolled PTE @ 2500 lb/hr (ton/yr)	Max Controlled PTE @ 2500 lb/hr (ton/yr)
weigh-up and blending area	Antimony	3.85E-03	99	3.89E-03	6.04	1.03E-01	1.03E-03	1.29E-01	1.29E-03
weigh-up and blending area	Nickel	3.85E-03	99	3.89E-03	5.22	8.89E-02	8.89E-04	1.11E-01	1.11E-03
weigh-up and blending area	Chromium	3.85E-03	99	3.89E-03	1.40	2.38E-02	2.38E-04	2.98E-02	2.98E-04
weigh-up and blending area	Manganese	3.85E-03	99	3.89E-03	3.40E-03	5.79E-05	5.79E-07	7.24E-05	7.24E-07
weigh-up and blending area	Cobalt	3.85E-03	99	3.89E-03	0.50	8.52E-03	8.52E-05	1.06E-02	1.06E-04
weigh-up and blending area	Copper	3.85E-03	99	3.89E-03	0.14	2.38E-03	2.38E-05	2.98E-03	2.98E-05
extrusion area	Antimony	2.40E-03	99	2.42E-03	6.04	6.41E-02	6.41E-04	8.02E-02	8.02E-04
extrusion area	Nickel	2.40E-03	99	2.42E-03	5.22	5.54E-02	5.54E-04	6.93E-02	6.93E-04
extrusion area	Chromium	2.40E-03	99	2.42E-03	1.40	1.49E-02	1.49E-04	1.86E-02	1.86E-04
extrusion area	Manganese	2.40E-03	99	2.42E-03	3.40E-03	3.61E-05	3.61E-07	4.51E-05	4.51E-07
extrusion area	Cobalt	2.40E-03	99	2.42E-03	0.50	5.31E-03	5.31E-05	6.64E-03	6.64E-05
extrusion area	Copper	2.40E-03	99	2.42E-03	0.14	1.49E-03	1.49E-05	1.86E-03	1.86E-05
quality control and sample testing area	Antimony	1.00E-03	99	1.01E-03	6.04	2.67E-02	2.67E-04	3.34E-02	3.34E-04
quality control and sample testing area	Nickel	1.00E-03	99	1.01E-03	5.22	2.31E-02	2.31E-04	2.89E-02	2.89E-04
quality control and sample testing area	Chromium	1.00E-03	99	1.01E-03	1.40	6.19E-03	6.19E-05	7.74E-03	7.74E-05
quality control and sample testing area	Manganese	1.00E-03	99	1.01E-03	3.40E-03	1.50E-05	1.50E-07	1.88E-05	1.88E-07
quality control and sample testing area	Cobalt	1.00E-03	99	1.01E-03	0.50	2.21E-03	2.21E-05	2.77E-03	2.77E-05
quality control and sample testing area	Copper	1.00E-03	99	1.01E-03	0.14	6.19E-04	6.19E-06	7.74E-04	7.74E-06

*Max rate of fines is calculated as max rate of fines collected divided by the efficiency of the cartridge filter.
Emission factors are calculated by the source to be the ratio of the metal compound utilized in the mixture to the total raw materials utilized.

Methodology

Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) = Max Rate of Fines @ 2000 lb/hr (ton/hr) x Emission Factor (lb/ton) x 8760 hr/yr x 1 ton/2000 lbs

Max Controlled PTE @ 2000 lb/hr (tons/yr) = Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) x (1-Control Efficiency (%))

Max Uncontrolled PTE @ 2500 lb/hr (ton/yr) = Max Uncontrolled PTE @ 2000 lb/hr (tons/yr) x 2500 (lb/hr) / 2000 (lb/hr)

Max Controlled PTE @ 2500 lb/hr (ton/yr) = Max Controlled PTE @ 2000 lb/hr (tons/yr) x 2500 (lb/hr) / 2000 (lb/hr)

Appendix A: Emissions Calculations
HAP Summary

Company Name: Rohm and Haas Chemical, LLC
 Address: 1102 Leiter Drive, Warsaw, Indiana, 46580
 FESOP Permit: 085-22604-00085
 Reviewer: ERG/JR
 Date: May 11, 2006

Uncontrolled Potential to Emit @ 2500 lb/hr (tons/yr)							
Emission Unit	Antimony	Nickel	Chromium	Manganese	Cobalt	Copper	Total HAPs
ACM-1	0.347	0.301	0.081	0.000	0.029	0.008	0.766
ACM-2	0.347	0.301	0.081	0.000	0.029	0.008	0.766
ACM-3	0.347	0.301	0.081	0.000	0.029	0.008	0.766
ACM-4	0.347	0.301	0.081	0.000	0.029	0.008	0.766
ACM-5	0.347	0.301	0.081	0.000	0.029	0.008	0.766
ACM-6	0.347	0.301	0.081	0.000	0.029	0.008	0.766
ACM-7	0.346	0.300	0.081	0.000	0.029	0.008	0.765
ACM-8	0.346	0.300	0.081	0.000	0.029	0.008	0.765
weigh-up and blending area	0.129	0.111	0.030	7.24E-05	0.011	0.003	0.283
extruder area	0.080	0.069	0.019	4.51E-05	0.007	0.002	0.177
quality control and sample testing area	0.033	0.029	0.008	1.8803E-05	0.003	0.001	7.36E-02
Total	3.017	2.613	0.704	0.002	0.252	0.071	6.66

Controlled Potential to Emit @ 2500 lb/hr (tons/yr)							
Emission Unit	Antimony	Nickel	Chromium	Manganese	Cobalt	Copper	Total HAPs
ACM-1	3.47E-04	3.01E-04	8.10E-05	1.96E-07	2.91E-05	8.23E-06	7.66E-04
ACM-2	3.47E-04	3.01E-04	8.10E-05	1.96E-07	2.91E-05	8.23E-06	7.66E-04
ACM-3	3.47E-04	3.01E-04	8.10E-05	1.96E-07	2.91E-05	8.23E-06	7.66E-04
ACM-4	3.47E-04	3.01E-04	8.10E-05	1.96E-07	2.91E-05	8.23E-06	7.66E-04
ACM-5	3.47E-04	3.01E-04	8.10E-05	1.96E-07	2.91E-05	8.23E-06	7.66E-04
ACM-6	3.47E-04	3.01E-04	8.10E-05	1.96E-07	2.91E-05	8.23E-06	7.66E-04
ACM-7	3.46E-04	3.00E-04	8.08E-05	1.95E-07	2.90E-05	8.21E-06	7.65E-04
ACM-8	3.46E-04	3.00E-04	8.08E-05	1.95E-07	2.90E-05	8.21E-06	7.65E-04
weigh-up area dust collection	1.29E-03	1.11E-03	2.98E-04	7.24E-07	1.06E-04	2.98E-05	2.83E-03
extruder area dust collection	8.02E-04	6.93E-04	1.86E-04	4.51E-07	6.64E-05	1.86E-05	1.77E-03
QC dust collection	3.34E-04	2.89E-04	7.74E-05	1.88E-07	2.77E-05	7.74E-06	7.36E-04
Total	5.20E-03	4.50E-03	1.21E-03	2.93E-06	4.33E-04	1.22E-04	0.011