



Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

CITY OF HAMMOND

RONALD L. NOVAK
Director

Federally Enforceable State Operating Permit Renewal

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

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**Davies Imperial Coatings, Inc.
1275 State Street
Hammond, Indiana 46320**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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.: F089-23466-00295	
Issued by:	Original signed by:
	 Ronald L. Novak, Director Hammond Department of Environmental Management
	Issuance Date: <u>January 10, 2008</u> Expiration Date: <u>January 10, 2018</u>

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary paint and paper coating manufacturing plant.

Source Address:	1275 State Street, Hammond, Indiana 46320
Mailing Address:	P.O. Box 790, Hammond, Indiana 46325
General Source Phone Number:	(219)933-0877
SIC Code:	2851 - Paints & Allied Products and 2672 - Paper Coated & Laminated
County Location:	Lake
Source Location Status:	Nonattainment for PM2.5 and 8-hour ozone, Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Paint Manufacturing Operation, identified as EU-01, includes the manufacturing of water-based and solvent-based traffic and industrial paints. This operation includes the following specific production equipment:

Equipment	Equipment ID No.	Construction Dates
<i>Traffic Paint Production</i>		
(4) 600 gallon tanks	L1, L2, L3, & L4	1972
(1) 2,000 gallon tank	12	1974
(1) 1,400 gallon tank	13	1974
(1) 2,700 gallon tank	14	1974
(1) 300 gallon mixer	G1	1972
<i>Industrial Paint Production</i>		
(1) 210 gallon mixer	G2	1969
(1) 330 gallon mixer	G3	1969
(1) 140 gallon mixer	G5	1969
(2) 540 gallon tanks with one common mixing arm	G7a & G7b	1990

The maximum design rate of pigments added is 0.75 ton per hour. The maximum production of solvent-based and water-based paints is 1 ton per hour of each type of paint. Both types of paint can be produced at any given time.

There is no air pollution control equipment associated with this operation.

- (b) Water-Based Traffic Paint Manufacturing Operation, identified as EU-02, consists of the following process units:

Equipment	Equipment ID No.	Construction Dates
(2) 2,000 gallon mixers with one common mixing arm	G8a & G8b	1996
(2) 7,000 gallon raw material tanks	1 & 2	1996
(1) 2,500 gallon tank	5	1998
(1) bag dump station w/ baghouse	D6	1996

The maximum design rate of pigments handled is 1 ton per hour. The maximum design rate of water-based traffic paint produced is 3.5 tons per hour.

Particulate emissions from the bag dump operation are controlled by a baghouse.

- (c) Paper Coating Manufacturing Operation, identified as EU-03, consists of the following process units:

Equipment	Equipment ID No.	Construction Dates
(5) 660 gallon mixers	M1, M2, M3, M4, & M5	1980 1993
(5) bag dump stations w/ baghouses	D1, D2, D3, D4, & D5	1989 1993 1994 1996
(3) 1500 gallon finished product holding tanks	1E, 3E, & 1W	1995 1992
(6) 2700 gallon finished product storage tanks	2E, 4E, 6E, 7E, 2W, & 3W	1994 2000 1996 1995 1993 1995
(1) 2500 gallon blend tank (Rigid Disk Manufacturing Operation)	4W RD	2002

The maximum design rate of raw material bag dumping is 2.5 tons per hour. Emissions from each bag dump station are controlled by a baghouse.

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

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

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) and the Hammond Department of Environmental Management (HDEM) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) 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, F089-23466-00295, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and HDEM, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect 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]

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

B.5 Severability [326 IAC 2-8-4(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 and HDEM, within a reasonable time, any information that IDEM, OAQ and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and HDEM copies of records required to be kept by this permit.

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

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

IDEM, OAQ and HDEM 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 April 15 of each year to:

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;

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

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

B.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 describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and HDEM and Northwest 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;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Hammond Department of Environmental Management phone: (219) 853-6306;
fax: (219) 853-6343
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

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

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 and HDEM 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 and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-8-11.1]

- (a) All terms and conditions of permits established prior to F089-23466-00295 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 2-8-3(h) and 326 IAC 2-8-9.

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 Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by 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, or HDEM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, or HDEM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(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, or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(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 HDEM 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(1).

Request for renewal shall be submitted to:

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and HDEM 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 and HDEM 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

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 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 the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ and HDEM 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 and 326 IAC 2-8-11.1.

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

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, and HDEM 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

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

C.1 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 volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6;
- (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;
- (3) 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
- (4) 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) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall render 326 IAC 2-2 not applicable.

(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.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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.8 Performance Testing [326 IAC 3-6]

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

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

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

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

- (b) The Permittee shall notify IDEM, OAQ and HDEM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by 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 and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and HDEM if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ and HDEM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ and HDEM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [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 and HDEM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by 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 Emission Reporting [326 IAC 2-8-4(3)] [Hammond Ordinance No. 7102]

- (a) The Permittee shall submit an annual emission inventory containing production information for each permitted unit. The emission inventory must be received by April 15th of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only. The emission inventory must be submitted to:

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320
- (b) The emission inventory 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 HDEM on or before the date it is due.

C.18 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 or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 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 IAC 2-1.1-1(1).

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

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by 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.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and HDEM. The general public may request this information from the IDEM, OAQ and HDEM under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Paint Manufacturing Operation, identified as EU-01, includes the manufacturing of water-based and solvent-based traffic and industrial paints. This operation includes the following specific production equipment:

Equipment	Equipment ID No.	Construction Dates
<i>Traffic Paint Production</i>		
(4) 600 gallon tanks	L1, L2, L3, & L4	1972
(1) 2,000 gallon tank	12	1974
(1) 1,400 gallon tank	13	1974
(1) 2,700 gallon tank	14	1974
(1) 300 gallon mixer	G1	1972
<i>Industrial Paint Production</i>		
(1) 210 gallon mixer	G2	1969
(1) 330 gallon mixer	G3	1969
(1) 140 gallon mixer	G5	1969
(2) 540 gallon tanks with one common mixing arm	G7a & G7b	1990

The maximum design rate of pigments added is 0.75 ton per hour. The maximum production of solvent-based and water-based paints is 1 ton per hour of each type of paint. Both types of paint can be produced at any given time.

There is no air pollution control equipment associated with this operation.

- (b) Water-Based Traffic Paint Manufacturing Operation, identified as EU-02, consists of the following process units:

Equipment	Equipment ID No.	Construction Dates
(2) 2,000 gallon mixers with one common mixing arm	G8a & G8b	1996
(2) 7,000 gallon raw material tanks	1 & 2	1996
(1) 2,500 gallon tank	5	1998
(1) bag dump station w/ baghouse	D6	1996

The maximum design rate of pigments handled is 1 ton per hour. The maximum design rate of water-based traffic paint produced is 3.5 tons per hour.

Particulate emissions from the bag dump operation are controlled by a baghouse.

- (c) Paper Coating Manufacturing Operation, identified as EU-03, consists of the following process units:

Equipment	Equipment ID No.	Construction Dates
(5) 660 gallon mixers	M1, M2, M3, M4, & M5	1980 1993
(5) bag dump stations w/ baghouses	D1, D2, D3, D4, & D5	1989 1993 1994 1996
(3) 1500 gallon finished product holding tanks	1E, 3E, & 1W	1995 1992
(6) 2700 gallon finished product storage tanks	2E, 4E, 6E, 7E, 2W, & 3W	1994 2000 1996 1995 1993 1995
(1) 2500 gallon blend tank (Rigid Disk Manufacturing Operation)	4W RD	2002

The maximum design rate of raw material bag dumping is 2.5 tons per hour. Emissions from each bag dump station are controlled by a baghouse.

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

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

D.1.1 PSD and Part 70 Minor Limits [326 IAC 2-2] [326 IAC 2-7]

Pursuant to F089-13932-00295 and revised by F089-23466-00295:

- (a) PM10 emissions from the Paint Manufacturing Operations EU-01 and EU-02 and the Paper Coating Manufacturing Operation EU-03 shall be less than 99 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The PM10 emissions from the Paint Manufacturing Operation, identified as EU-01, shall not exceed 17 lbs/ton of pigments processed while producing solvent-based paint.
- (c) The PM10 emissions from the Paint Manufacturing Operation, identified as EU-01, shall not exceed 17 lbs/ton of pigments processed while producing water-based paint.

- (d) The PM10 emissions from the Water-Based Traffic Paint Manufacturing Operation, identified as EU-02, shall not exceed 17 lbs/ton of pigments processed while producing water-based traffic paint.
- (e) The PM10 emissions from the Paper Coating Manufacturing Operation, identified as EU-03, shall not exceed 0.14 lb/ton of raw material processed.

Compliance with these limits in combination with the PM10 emissions from other emission units shall limit source-wide PM10 emissions to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable to the entire source.

D.1.2 VOC BACT, Emission Offset and Part 70 Minor Limits [326 IAC 8-1-6] [326 IAC 2-3] [326 IAC 2-7]

Pursuant to F089-13932-00295 and revised by F089-23466-00295:

- (a) VOC emissions from the Paint Manufacturing Operations EU-01 and EU-02 shall be less than 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The VOC emissions from the Paint Manufacturing Operation, identified as EU-01, shall not exceed 24 lbs/ton of solvent-based paint produced.
- (c) The VOC emissions from the Paint Manufacturing Operation, identified as EU-01, shall not exceed 3.6 lbs/ton of water-based paint produced.
- (d) The VOC emissions from the Water-Based Traffic Paint Manufacturing Operation, identified as EU-02, shall not exceed 2.88 lbs/ton of water-based traffic paint produced.

Compliance with these limits in combination with the VOC emissions from other emission units shall limit source-wide VOC emissions to less than 25 tons per twelve (12) consecutive month period and render 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70) not applicable to the entire source.

D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the Paint Manufacturing Operation, Water-Based Traffic Paint Manufacturing Operation and the Paper Coating Manufacturing Operation shall not exceed the emission limits shown in the table below:

Process ID	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
Paint Manufacturing Operation	0.75	3.38
Water-Based Traffic Paint Manufacturing Operation	1	4.1
Paper Coating Manufacturing Operation	2.5	7.58

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

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

Where:

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

- (a) In order to comply with Conditions D.1.1 and D.1.3, the particulate control devices for PM and PM10 control shall be in operation at all times when the Water-Based Traffic Paint Manufacturing Operation and the Paper Coating Manufacturing Operation are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 PM10 Compliance Determination

In order to comply with Condition D.1.1 (a), PM10 emissions shall be determined from the following equation:

Tons of PM10 emitted per month = Tons of pigments used for solvent-based paint X 17 lbs/ton of pigment processed / 2000 + Tons of pigment used for water-based paint X 17 lbs/ton of pigment processed / 2000 + Tons of pigment used for water-based traffic paint X 17 lbs/ton of pigment processed / 2000 X (1-0.9) + Tons throughput paper coating manufacturing operation X 0.14 lb/ton / 2000 X (1-0.9).

D.1.7 VOC Compliance Determination

In order to comply with Condition D.1.2 (a), VOC emissions shall be determined from the following equation:

Tons of VOC emitted per month = Tons of solvent-based paint produced X 24 lbs VOC/ton of paint produced / 2000 + Tons of water-based paint produced X 3.6 lbs VOC/ton of paint produced / 2000 + Tons of water-based traffic paint produced X 2.88 lbs VOC/ton of paint produced / 2000.

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

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the Water-Based Traffic Paint Manufacturing Operation and Paper Coating Manufacturing Operation baghouse exhausts shall be performed once per day during normal daylight operations. 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.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the Water-Based Traffic Paint and Paper Coating Manufacturing Operations, at least once per day when the associated dump station is in operation. When for any one reading, the pressure drop across each baghouse is outside the following normal ranges:

Unit ID	ΔP range (inches of water)
<i>Water-Based Traffic Paint Manufacturing Operation</i>	
Baghouse 6	2 - 4
<i>Paper Coating Manufacturing Operation</i>	
Baghouse 1	1 - 9

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A pressure reading that is outside the above-mentioned ranges 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 violation of this permit.

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

D.1.10 Baghouse Inspections and Maintenance [Hammond Air Quality Control Ordinance No. 3522]

An inspection shall be performed each calendar quarter of all bags controlling the Paper Coating Manufacturing Operation. All defective bags shall be replaced. This is a local requirement only.

The Permittee shall be required to change the bags on Paper Coating Manufacturing Operation Baghouse 1, at a minimum, every two (2) months as recommended by the manufacturer. This is a local requirement only.

D.1.11 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the 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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

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

D.1.12 Particulate Matter less than 10 microns in diameter (PM10)

To document compliance with Condition D.1.1, the Permittee shall maintain a monthly record of the following:

- a) Total quantity of pigments used in the Paint Manufacturing Operation (Solvent-Based Paints).
- b) Total quantity of pigments used in the Paint Manufacturing Operation (Water-Based Paints).
- c) Total quantity of pigments used in the Water-Based Traffic Paint Manufacturing Operation.
- d) Total quantity of raw materials processed in the Paper Coating Manufacturing Operation.

D.1.13 Volatile Organic Compound (VOC)

To document compliance with Condition D.1.2, the Permittee shall maintain a monthly record of the following:

- a) Total quantity of solvent-based paint produced.
- b) Total quantity of water-based paint produced.
- c) Total quantity of water-based traffic paint produced.

D.1.14 Record Keeping Requirements – Volatile Organic Liquid Storage Vessels

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall keep the following records for the life of the vessel:

- The vessel identification number.
- The vessel dimensions.
- The vessel capacity.

D.1.15 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.
 - (1) The amount and the VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; and
 - (2) The total VOC usage each month.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of each baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the Water-Based Traffic Paint Manufacturing Operation and the baghouse controlling the Paper Coating Manufacturing Operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections and the dates of bag changes as required under Condition D.1.10. This is a local requirement only.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: **Davies Imperial Coatings, Inc.**
Source Address: 1275 State Street, Hammond, Indiana 46320
Mailing Address: P.O. Box 790, Hammond, Indiana 46325
FESOP No.: **F089-23466-00295**

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:
<input type="checkbox"/> Annual Compliance Certification Letter
<input type="checkbox"/> Test Result (specify)
<input type="checkbox"/> Report (specify)
<input type="checkbox"/> Notification (specify)
<input type="checkbox"/> Affidavit (specify)
<input type="checkbox"/> 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR POLLUTION CONTROL DIVISION
5925 CALUMET AVENUE
HAMMOND, INDIANA 46320**

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

Source Name: **Davies Imperial Coatings, Inc.**
Source Address: 1275 State Street, Hammond, Indiana 46320
Mailing Address: P.O. Box 790, Hammond, Indiana 46325
FESOP No.: **F089-23466-00295**

This form consists of 2 pages

Page 1 of 2

<p>— This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), the Hammond Department of Environmental Management (HDEM) and the Northwest Regional Office, within four (4) business hours (1- 800-451-6027 or 317-233-0178, ask for IDEM Compliance Section), (219-853-6306, for HDEM) and (219-757-0265, for Northwest Regional Office); and• The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865, IDEM; 219-853-6343, HDEM; and 219-757-0267, Northwest Regional Office), 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:

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**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR POLLUTION CONTROL DIVISION**

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

Source Name: **Davies Imperial Coatings, Inc.**
Source Address: 1275 State Street, Hammond, Indiana 46320
Mailing Address: P.O. Box 790, Hammond, Indiana 46325
FESOP No.: **F089-23466-00295**

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<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 MANAGEMENT
COMPLIANCE DATA SECTION**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
- AIR POLLUTION CONTROL DIVISION -**

FESOP Quarterly Report

Source Name: **Davies Imperial Coatings, Inc.**
Source Address: 1275 State Street, Hammond, Indiana 46320
Mailing Address: P.O. Box 790, Hammond, Indiana 46325
FESOP Permit No.: **F089-23466-00295**
Facility: Paint Manufacturing Operations, EU-01 and EU-02, and
Paper Coating Manufacturing Operation, EU-03
Parameter: PM10
Limit: **Less than 99 tons per twelve (12) consecutive month period.**

YEAR: _____

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

No deviation occurred in this quarter.

Deviation(s) occurred this quarter.

Deviation(s) has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
- AIR POLLUTION CONTROL DIVISION -**

FESOP Quarterly Report

Source Name: **Davies Imperial Coatings, Inc.**
Source Address: 1275 State Street, Hammond, Indiana 46320
Mailing Address: P.O. Box 790, Hammond, Indiana 46325
FESOP Permit No.: **F089-23466-00295**
Facility: Paint Manufacturing Operations, EU-01 and EU-02
Parameter: VOC
Limit: **Less than 24 tons per twelve (12) consecutive month period.**

YEAR: _____

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

No deviation occurred in this quarter.

Deviation(s) occurred this quarter.

Deviation(s) has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

and

Hammond Department of Environmental Management

Addendum to the Technical Support Document for a
Federally Enforceable State Operating Permit Renewal

Source Name: Davies Imperial Coatings, Inc.
Source Location: 1275 State Street, Hammond, Indiana 46325
County: Lake
SIC Code: 2851 – Paint & Allied Products and 2672 – Paper Coated & Laminated
Operation Permit No.: F089-23466-00295
Permit Reviewer: Debra Malone, HDEM

On November 30, 2007, the Hammond Department of Environmental Management (HDEM) had a notice published in the Times, Hammond, Indiana, stating that Davies Imperial Coatings, Inc. had applied for a Federally Enforceable State Operating Permit Renewal to operate a paint and paper coating manufacturing plant. The notice also stated that HDEM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

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

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

Federally Enforceable State Operating Permit Renewal

1. On page 7 of 39 of the permit, under A.4 FESOP Applicability, Hammond Department of Environmental Management (HDEM) has been inserted after the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ).

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) **and the Hammond Department of Environmental Management (HDEM)** to renew a Federally Enforceable State Operating Permit (FESOP).

2. On page 31 of 39 of the permit, under Section D.1, Condition D.1.11 Broken or Failed Bag Detection has been modified as follows:

D.1.11 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as ~~a malfunction~~ **an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions)**.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the 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 emissions unit. Operations may continue only if the event qualifies as ~~a malfunction~~ **an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions)**.

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

3. On page 32 of 39 of the permit, under Section D.1, Condition D.1.15 Record Keeping Requirements has been modified as follows:

- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a daily record of the pressure drop across ~~each~~ **the** baghouse controlling the Water-Based Traffic Paint Manufacturing Operation and the **baghouse controlling the** Paper Coating Manufacturing Operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).

4. On page 34 of 39 of the permit, the IDEM address on the Emergency Occurrence Report has been corrected as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
~~P.O. Box 6015~~
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana ~~46206-6015~~ 46204-2251**

5. On December 16, 2007, rule revisions to 326 IAC 2-1.1-9 and 326 IAC 2-8-4 were finalized allowing for ten (10) year permit terms on FESOP renewals. On page 8 of 39 of the permit, Condition B.2 Permit Term has been revised to reflect the ten (10) year permit term.

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, F089-23466-00295, is issued for a fixed term of ~~five (5)~~ **ten (10)** years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

Source Background and Description

Source Name:	Davies Imperial Coatings, Inc.
Source Location:	1275 State Street, Hammond, Indiana 46320
County:	Lake
SIC Code:	2851 – Paints & Allied Products and 2672 –Paper Coated & Laminated
Permit Renewal No.:	F089-23466-00295
Permit Reviewer:	Debra Malone, HDEM

The Hammond Department of Environmental Management (HDEM) has reviewed the operating permit renewal application from Davies Imperial Coatings, Inc. relating to the operation of a Paint and Paper Coating Manufacturing Plant.

History

On July 24, 2006, Davies Imperial Coatings, Inc. submitted applications to the OAQ and HDEM requesting to renew its operating permit. Davies Imperial Coatings, Inc. was issued a FESOP Renewal on April 24, 2002.

Permitted Emission Units and Pollution Control Equipment

- (a) Paint Manufacturing Operation, identified as EU-01, includes the manufacturing of water-based and solvent-based traffic and industrial paints. This operation includes the following specific production equipment:

Equipment	Equipment ID No.	Construction Dates
<i>Traffic Paint Production</i>		
(4) 600 gallon tanks	L1, L2, L3, & L4	1972
(1) 2,000 gallon tank	12	1974
(1) 1,400 gallon tank	13	1974
(1) 2,700 gallon tank	14	1974
(1) 300 gallon mixer	G1	1972
<i>Industrial Paint Production</i>		
(1) 210 gallon mixer	G2	1969
(1) 330 gallon mixer	G3	1969
(1) 140 gallon mixer	G5	1969
(2) 540 gallon tanks with one common mixing arm	G7a & G7b	1990

The maximum design rate of pigments added is 0.75 ton per hour. The maximum production of solvent-based and water-based paints is 1 ton per hour of each type of paint. Both types of paint can be produced at any given time.

- (b) Water-Based Traffic Paint Manufacturing Operation, identified as EU-02, consists of the following process units:

Equipment	Equipment ID No.	Construction Dates
(2) 2,000 gallon mixers with one common mixing arm	G8a & G8b	1996
(2) 7,000 gallon raw material tanks	1 & 2	1996
(1) 2,500 gallon tank	5	1998
(1) bag dump station w/ baghouse	D6	1996

The maximum design rate of pigments handled is 1 ton per hour. The maximum design rate of water-based traffic paint produced is 3.5 tons per hour.

Particulate emissions from the bag dump operation are controlled by a baghouse.

- (c) Paper Coating Manufacturing Operation, identified as EU-03, consists of the following process units:

Equipment	Equipment ID No.	Construction Dates
(5) 660 gallon mixers	M1 & M2, M3 & M4, & M5	1980 1993
(5) bag dump stations w/ baghouses	D1, D2, D3, D4, & D5	1989 1993 1994 1996
(3) 1500 gallon finished product holding tanks	1E, 3E, & 1W	1995 1992
(6) 2700 gallon finished product storage tanks	2E, 4E, 6E, 7E, 2W, & 3W	1994 2000 1996 1995 1993 1995
(1) 2500 gallon blend tank (Rigid Disk Manufacturing Operation)	4W RD	2002

The maximum design rate of raw material bag dumping is 2.5 tons per hour. Emissions from each bag dump station are controlled by a baghouse.

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

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

Emission Units and Pollution Control Equipment Removed From the Source

The two (2) 1700 gallon tanks, equipment id nos. 10 & 11, were removed from the Paint Manufacturing Operation – Traffic Paint Production in 2004.

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

Existing Approvals

Since the issuance of the FESOP Renewal (F089-13932-00295) on April 24, 2002, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. (19388-00295) issued on July 2, 2004.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Nonattainment
SO ₂	Attainment
NO ₂	Unclassifiable/Attainment
8-hour Ozone	Moderate Nonattainment
CO	Unclassifiable/Attainment
Lead	Attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
- (1) On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air Quality

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

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability for the source section.

- (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Lake County has been classified as attainment or unclassifiable in Indiana for particulates less than ten (10) microns in diameter (PM10), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), and Lead (Pb). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	155.96
PM-10	131.97
SO ₂	0.01
VOC	165.13
CO	1.41
NO _x	1.68

HAPs	tons/year
Methanol	<4
Toluene	<4
Xylene	<4
Total	<12

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 is equal to or greater than 100 tons per year and VOC is equal to or greater than 25 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM-10 and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Fugitive Emissions

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

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	3.93
PM-10	3.34
SO ₂	0
VOC	7.71
CO	0
NO _x	0
Methanol	0.69
Toluene	0.59
Xylene	2.31

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.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Solvent & Water-Based Paint Manufacturing Operation	14.8	14.8	-	< 25	-	-	< 10 single < 25 combined
Water-Based Traffic Paint Manufacturing Operation	17.96	17.96	-		-	-	
Paper Coating Manufacturing Operation	33.2	33.2	-	-	-	-	
HAPs Emissions (Storage Tanks 12 – 14 & UST 1)	-	-	-	-	-	-	
Combustion Units	Negligible	Negligible	Negligible	Negligible	1.41	1.68	
Total Emissions	65.96	65.96	Negligible	< 25	1.41	1.68	< 10 single < 25 combined

PM emissions are limited by 326 IAC 6-3-2. The combined VOC emissions from the Water-Based Traffic Paint Manufacturing Operation and the Paint Manufacturing Operation shall be limited to less

than 25 tons per year so that the requirements of New facilities; general reduction requirements (326 IAC 8-1-6) and the Part 70 Operating Permit Program, respectively, do not apply.

- (a) This existing stationary source is not major for 326 IAC 2-2, PSD because the emissions of each attainment pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for 326 IAC 2-3, Emission Offset because the emissions of the nonattainment pollutant, VOC, are less than twenty-five (<25) tons per year and the emissions of NOx are less than 100 tons per year.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb, are not included in the permit for the storage tanks because they each have a design capacity of less than 40 m³ (10,500 gallons).
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 61, 40 CFR Part 63) included in this permit renewal because it is not a major source for HAPs.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on March 18, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

This existing stationary source is not major for 326 IAC 2-2, PSD because the uncontrolled emissions of each attainment pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

326 IAC 2-3 (Emission Offset)

The potential emissions of the nonattainment pollutant, VOC, are greater than twenty-five (>25) tons per year therefore, a federally enforceable limit for VOC shall be established.

- (1) VOC emissions from the Paint Manufacturing Operations EU-01 and EU-02 shall be less than 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits combined with the VOC emissions from other emission units, shall limit source-wide VOC emissions to less than 25 tons per twelve (12) consecutive month period and render 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70) not applicable to this source.

- (2) The VOC emissions from the Paint Manufacturing Operation, identified as EU-01, shall not exceed 24 lbs/ton of solvent-based paint produced.
- (3) The VOC emissions from the Paint Manufacturing Operation, identified as EU-01, shall not exceed 3.6 lbs/ton of water-based paint produced.
- (4) The VOC emissions from the Water-Based Traffic Paint Manufacturing Operation, identified as EU-02, shall not exceed 2.88 lbs/ton of water-based traffic paint produced.

326 IAC 2-6 (Emission Reporting)

This source, located in Lake County, does not emit volatile organic compounds (VOC) or oxides of nitrogen (NOx) at levels equal to or greater than twenty-five (25) tons per year. Therefore, 326 IAC 2-6 does not apply.

However, pursuant to the Hammond Ordinance No. 7102, the source will be required to submit an annual emission inventory containing the production information necessary to determine compliance and confirm the source classification and permit level. The emission inventory must be received by April 15th of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM10 emissions shall be less than one hundred (100) tons per year and the amount of VOC emissions shall be less than twenty-five (25) tons per year. A federally enforceable PM10 limit of 100 tons per year will be established by this permit. The VOC emission limit in 326 IAC 2-3 shall also satisfy the requirements of 326 IAC 2-8-4.

The PM10 emissions shall be limited as follows:

- (1) PM10 emissions from the Paint Manufacturing Operations EU-01 and EU-02 and the Paper Coating Manufacturing Operation EU-03 shall be less than 99 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The PM10 emissions from the Paint Manufacturing Operation, identified as EU-01, shall not exceed 17 lbs/ton of pigments processed while producing solvent-based paint.
- (3) The PM10 emissions from the Paint Manufacturing Operation, identified as EU-01, shall not exceed 17 lbs/ton of pigments processed while producing water-based paint.
- (4) The PM10 emissions from the Water-Based Traffic Paint Manufacturing Operation, identified as EU-02, shall not exceed 17 lbs/ton of pigments processed while producing water-based traffic paint.
- (5) The PM10 emissions from the Paper Coating Manufacturing Operation, identified as EU-03, shall not exceed 0.14 lb/ton of raw material processed.

Compliance with these limits in combination with the PM10 emissions from other emission units shall limit source-wide PM10 emissions to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70) not applicable to the entire source.

State Rule Applicability – Individual Facilities

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

The operation of the Paint and Paper Coating Manufacturing Plant will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

Pursuant to F089-5435-00295, issued on December 9, 1996 and 326 IAC 6-3-2, the particulate matter (PM) from the Paint Manufacturing Operation, Water-Based Traffic Paint Manufacturing Operation and the Paper Coating Manufacturing Operation shall be limited by the following:

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

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

For the Paint Manufacturing Operation:

$$P = 0.75 \text{ Ton per hour} \\ E = 4.10 \times (P^{0.67}) \\ E = 4.10 \times (0.75^{0.67}) = 3.38 \text{ pounds per hour}$$

For the Water-Based Traffic Paint Manufacturing Operation:

$$P = 1 \text{ Ton per hour} \\ E = 4.10 \times (P^{0.67}) \\ E = 4.10 \times (1^{0.67}) = 4.1 \text{ pounds per hour}$$

The particulate control device shall be in operation at all times that the Water-Based Traffic Paint Manufacturing Operation is in operation, in order to comply with this limit.

Paper Coating Manufacturing Operation:

$$P = 2.5 \text{ Tons per hour} \\ E = 4.10 \times (P^{0.67}) \\ E = 4.10 \times (2.5^{0.67}) = 7.58 \text{ pounds per hour}$$

The particulate control device shall be in operation at all times that the Paper Coating Manufacturing Operation is in operation, in order to comply with this limit.

326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County)

This rule is applicable to this source located in Lake County because although the source is not specifically listed in 326 IAC 6.8-2 through 326 IAC 6.8-11 of this rule the source has the potential to emit one hundred (100) tons or more of particulate matter per year.

However, facilities at this source do not have any stacks and exhaust into a large open space; therefore if the particulate matter limitations were to be calculated using 326 IAC 6.8-1-2, the emission limits would be extremely large. The 326 IAC 6-3-2 limits would be more stringent than 326 IAC 6.8 limits; therefore, the source is subject to 326 IAC 6-3-2.

326 IAC 8-1-6 (New facilities; general reduction requirements)

The emission limit established by 326 IAC 2-3 Minor Limit shall render 326 IAC 8-1-6 not applicable to the Water-Based Traffic Paint Manufacturing Operation.

326 IAC 8-2-5 (Paper coating operation)

This rule is not applicable to this source because the source only manufactures the paper coating and does not perform the coating of paper.

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

The storage tanks are only subject to the record keeping requirements of 326 IAC 8-9-6(a) and (b) because each has a capacity of less than thirty-nine thousand (39,000) gallons. Pursuant to 326 IAC 8-9-6, the Permittee shall keep the following records for the life of the vessel:

- a) The vessel identification number.
- b) The vessel dimensions.
- c) The vessel capacity.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

1. The Water-Based Traffic Paint and Paper Coating Manufacturing Operations have applicable compliance monitoring conditions as specified below:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse 6 (Water-Based Traffic Paint Mfg. Operation)	Water Pressure Drop	Daily	2 to 4 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Baghouse 1 (Paper Coating Manufacturing Operation)	Water Pressure Drop	Daily	1 to 9 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary because the baghouses for the Water-Based Traffic Paint Manufacturing Operation and the Paper Coating Manufacturing Operation must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

2. An inspection shall be performed each calendar quarter of all bags controlling the Paper Coating Manufacturing Operation. All defective bags shall be replaced. This is a local requirement only.

The bags in Baghouse 1 of the Paper Coating Manufacturing Operation shall be replaced every 2 months. Dates of bag changes shall be logged and maintained for inspection by HDEM. This is a local requirement only.

3. Monthly records of the following process parameters shall be maintained and submitted on the forms attached to demonstrate compliance with the applicable emission limitations:

- 1) Total quantity of solvent-based paint produced.
- 2) Total quantity of water-based paint produced.
- 3) Total quantity of Water-Based Traffic Paint produced.
- 4) Total quantity of pigments used in the Paint Manufacturing Operation (Solvent-Based Paints).
- 5) Total quantity of pigments used in the Paint Manufacturing Operation (Water-Based Paints).
- 6) Total quantity of pigments used in the Water-Based Traffic Paint Manufacturing Operation.
- 7) Total quantity of raw material bag dumped in the Paper Coating Manufacturing Operation.

4. Quarterly reports shall be submitted to HDEM and OAQ. These reports shall include items 1 – 7 listed above.

These monitoring conditions are necessary to ensure compliance with the requirements of 326 IAC 2-8 (FESOP).

Recommendation

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

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

An application for the purposes of this review was received on July 24, 2006. Additional information was received on February 28, 2007, March 7, 2007, July 30, 2007 and October 9, 2007.

Conclusion

The operation of this **Paint and Paper Coating Manufacturing Plant** shall be subject to the conditions of the attached **FESOP Renewal No. F089-23466-00295**.

Plant ID: 00295

Davies Imperial Coatings, Inc.

1275 State Street, Hammond, Indiana 46320

Calculations By: L. Biscocho
Modified By: D. Malone

Emission Information Receipt Date: 4/9/07
Date of Calc: 10/10/07

NO. OF POINTS: 3
NO. OF SEGMENTS: 5

NOTES

EF: EMISSION FACTOR
CE: CONTROL EFFICIENCY

MDR: MAXIMUM DESIGN RATE
MDC: MAXIMUM DESIGN CAPACITY

Ts: STACK DISCHARGE TEMPERATURE
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

EU-01: Paint Manufacturing Operation

This operation includes the production of solvent-based and water-based traffic paints, and solvent-based and water-based industrial paints.

Includes: *(Used for solvent-based & water-based traffic paint)*

- (4) 600 gal tanks: IDs L1, L2, L3, & L4
- (1) 2,000 gal tank: ID 12
- (1) 1,400 gal tank: ID 13
- (1) 2,700 gal tank: ID 14
- (1) 300 gal Mixer: ID G1

(Used for solvent-based & water-based industrial paints)

- (1) 140 gal mixer: ID G5
- (1) 210 gal mixer: ID G2
- (1) 330 gal mixer: ID G3
- (2) 540 gal mix tanks with one common mixing arm: ID G7a & G7b

(Pigments Handling) MDR(T processed/hr): 0.375

STACK ID (DIAM:HEIGHT): (No Stack)

(Solvent-based Paints) - General Mixing & Handling MDR (T produced/hr): 1

FLOWRATE (ACFM): N/A

Ts(°F): N/A

CNTRL DEV: None

POLLUTANT	EF(LB/T)	CE (%)	PERMITTED OPERATING HRS: 8760 hr/yr					
			BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	20	0	7.5000	180.0000	32.8500	7.5000	32.8500	N/A
PM10	17	0	6.3750	153.0000	27.9225	6.3750	27.9225	N/A
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	24	0	24.0000	576.0000	105.1200	24.0000	105.1200	N/A
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
HAPS	2.41	0	2.4072	57.7728	10.5435	2.4072	10.5435	N/A

PM/PM10 EF: SCC # 3-01-014-02 Pigment Handling (Lb/Tons Pigment Processed), (AP-42, Section 6.4, Table 6.4-1)

VOC EF: SCC # 3-01-014-01 General Mixing and Handling (Lb/Tons Paint Produced), (AP-42, Section 6.4, Table 6.4-1)

HAPS EF: 10.03% VOC EF per MSDS.

EF for conventional paints is 30 lbs VOC per ton of paint produced. This is based on a solvent by weight content of 50%.

The average solvent by weight content of Davies' solvent-based paint is 40%.

Thus, EF for solvent-based paints for Davies is, therefore, 30x(40/50) = 24 lb/ton of paint produced.

(Pigments Handling) MDR(T processed/hr): 0.375
 (Water-based Paints) - General Mixing & Handling MDR (T produced/hr): 1

STACK ID (DIAM:HEIGHT): (No Stack)
 FLOWRATE (ACFM): N/A
 Ts(°F): N/A

CNTRL DEV: None

			PERMITTED OPERATING HRS: 8760 hr/yr		8760 hr/yr			
			POTENTIAL TO EMIT (PTE)					
			BEFORE CONTROLS			AFTER CONTROLS		
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	20	0	7.5000	180.0000	32.8500	7.5000	32.8500	N/A
PM10	17	0	6.3750	153.0000	27.9225	6.3750	27.9225	N/A
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	3.6	0	3.6000	86.4000	15.7680	3.6000	15.7680	N/A
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
HAPS	0.05	0	0.0526	1.2614	0.2302	0.0526	0.2302	N/A

PM/PM10 EF: SCC # 3-01-014-02 Pigment Handling (Lb/Tons Pigment Processed), (AP-42, Section 6.4, Table 6.4-1)
 VOC EF: SCC # 3-01-014-01 General Mixing and Handling (Lb/Tons Paint Produced), (AP-42, Section 6.4, Table 6.4-1)
 HAPS EF: 1.46% VOC EF per MSDS.

EF for conventional paints is 30 lbs VOC per ton of paint produced. This is based on a solvent by weight content of 50%.
 The average solvent by weight content of Davies' water-based paint is 6%.
 Thus, EF for water-based paints for Davies is, therefore, $30 \times (6/50) = 3.6$ lb/ton of paint produced.

EU-02: Water-Based Traffic Paint Manufacturing Operation

- Includes:**
- (2) 7000 gal tanks: ID 1, & 2
 - (2) 2000 gal mixers: ID G8a & G8b
 - (1) 2500 gallon tank: 5
 - (1) bulk handling system for CaCO₃
 - (1) Bag Dump station for TiO₂ & CaCO₃. (Stack ID 1)

(Pigments Handling) MDR (T processed/hr): 1

STACK ID (DIAM:HEIGHT):

(Water-based Paints) - General Mixing & Handling MDR (T produced/hr): 3.5

FLOWRATE (ACFM):

CNTRL DEV: Self Contained Bag Filter

Ts(°F):

			PERMITTED OPERATING HRS: 8760 hr/yr		POTENTIAL TO EMIT (PTE)				
			BEFORE CONTROLS			AFTER CONTROLS			
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	
PM	20	0.9	20.0000	480.0000	87.6000	2.0000	8.7600	N/A	
PM10	17	0.9	17.0000	408.0000	74.4600	1.7000	7.4460	N/A	
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	
VOC	2.88	0	10.0800	241.9200	44.1504	10.0800	44.1504	N/A	
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	
HAPS	0.07	0	0.2460	5.9028	1.0773	0.2460	1.0773	N/A	

PM/PM10 EF: SCC # 3-01-014-02 Pigment Handling (Lb/Tons Pigment Processed), (AP-42, Section 6.4, Table 6.4-1)

VOC EF: SCC # 3-01-014-01 General Mixing and Handling (Lb/Tons Paint Produced), (AP-42, Section 6.4, Table 6.4-1)

HAPS EF: 2.44% VOC EF per MSDS.

EF for conventional paints is 30 lbs VOC per ton of paint produced. This is based on a solvent by weight content of 50%.

The average solvent by weight content of Davies' water-based traffic paint is 4.8%.

Thus, EF for water-based traffic paints for Davies is, therefore, 30x(4.8/50) = 2.88 lb/ton of paint produced.

 EU-03: Paper Coating Manufacturing

- Includes:**
- (5) 660-gal mixers: ID M1, M2, M3, M4, M5
 - (6) 2700-gal finished product storage tanks: ID 2E, 4E, 6E, 7E, 2W, & 3W
 - (3) 1500-gal finished product holding tanks: ID 1E, 3E, & 1W
 - (1) 2500-gal blend tank for Rigid Disk Manufacturing Operation: 4W RD
 - (5) Bag Dump stations w/ baghouses for amorphous silicon dioxide, fumed silica & fumed alumina: ID D1, D2, D3, D4, & D5
- MDR (T produced/hr): 2.5

STACK ID (DIAM:HEIGHT):
 FLOWRATE (ACFM):

CNTRL DEV: Self Contained Bag Filter

SCC # 3-05-011-07			PERMITTED OPERATING HRS: 8760 hr/yr					
			POTENTIAL TO EMIT (PTE)					
			BEFORE CONTROLS			AFTER CONTROLS		
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0.24	0.9	0.6000	14.4000	2.6280	0.0600	0.2628	N/A
PM10	0.14	0.9	0.3500	8.4000	1.5330	0.0350	0.1533	N/A
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A
Lead	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

MDR is the raw material bag dumped per hour.

PM/PM10 EF: SCC # 3-05-011-07 Cement Unloading: Storage Bins (Lb/Tons Processed)

Combustion Units

Unit ID: Combustion Units
(Natural Gas Combustion)

MDC (mmBtu/hr): 4.036
MDR (mmcft/hr): 0.0038

HEAT CONTENT (Btu/cft): 1,050
QTY BURNED (mmcft/yr):

STACK ID (DIAM:HEIGHT): (Various)

CNTRL DEV:

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

(AP-42, Table 1.4-1, 2, & 3)			POTENTIAL TO EMIT (PTE)					
POLLUTANT	EF(lbs/mmcft)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	1.9	0	0.0073	0.1753	0.0320	0.0073	0.0320	N/A
PM10	7.6	0	0.0292	0.7011	0.1280	0.0292	0.1280	N/A
SOx	0.6	0	0.0023	0.0554	0.0101	0.0023	0.0101	N/A
NOx	100	0	0.3844	9.2251	1.6836	0.3844	1.6836	N/A
VOC	5.5	0	0.0211	0.5074	0.0926	0.0211	0.0926	N/A
CO	84	0	0.3229	7.7491	1.4142	0.3229	1.4142	N/A
Lead	0.0005	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A

Emission Factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC # 1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(25) units -

- Hot Water Heater No. 1 - 0.040 MMBtu/hr
- Furnaces No. 1-8 - 0.225, 0.225, 0.160, 0.160, 0.400, 0.160, 0.320, & 0.200 MMBtu/hr, respectively
- three (3) Sterling OVF175 Unit Heaters - 0.175 MMBtu/hr each
- One (1) Armstrong Furnace and Air Conditioning Unit - 0.075 MMBtu/hr
- One (1) Make-Up Air Unit, Model RPB - 0.2 MMBtu/hr
- (2) Furnaces: 0.1 & 0.15 MMBtu/hr
- (2) Furnaces: 0.125 & 0.15 MMBtu/hr for the chiller room
- (1) heater: 0.1 MMBtu/hr - label room of the Latex Road Marking Paint Mfg. Op
- (1) heater: 0.125 MMBtu/hr - latex room
- (4) furnaces: (1) 0.125 MMBtu/hr & (3) 0.145 MMBtu/hr - New Warehouse
- (1) Hot water heater: 0.036 MMBtu/hr - New Locker Room

Unrestricted Potential Emissions

Pollutant	tons/yr
PM	155.96
PM-10	131.97
SO2	0.01
VOC	165.13
CO	1.41
NOx	1.68

HAPs	tons/yr
Methanol	<4
Toluene	<4
Xylene	<4
Total	<12

Potential to Emit After Issuance

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
Paint Manufacturing Operation (Solvent & Water-Based)	14.8	14.8	-	< 25	-	-	< 10 single < 25 combined
Latex Traffic Paint Manufacturing Operation	17.96	17.96	-		-	-	
Paper Coating Manufacturing Operation	33.2	33.2	-		-	-	
Combustion Units	Negligible	Negligible	Negligible	Negligible	1.41	1.68	
Total Emissions	65.96	65.96	Negligible	< 25	1.41	1.68	< 10 single < 25 combined