



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: July 19, 2007  
RE: MACtac / 005-23610-00087  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

**Notice of Decision: Approval – Effective Immediately**

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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



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www.IN.gov/idem

## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**MACtac  
2576 Norcross Drive  
Columbus, Indiana 47201**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T005-23610-00087	
Issued by: Original signed by  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 19, 2007  Expiration Date: July 19, 2012

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary paper coating plant.

Source Address:	2576 Norcross Drive, Columbus, IN 47201
Mailing Address:	2576 Norcross Drive, Columbus, IN 47201
General Source Phone Number:	(812) 341-2701
SIC Code:	2672
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) paper coating line, identified as CL-968, constructed in 1999, consisting of the following units:
  - (1) One (1) flexographic ink print station, with emissions exhausted to Stack PNT-D1;
  - (2) One (1) roll coat release coating station, with emissions exhausted to Stacks R-1 and R-D1;
  - (3) One (1) die coat adhesive coating station, with emissions exhausted to Stacks ADH-D1, ADH-D2, ADH-D3, and ADH-D4; and
  - (4) One (1) roll coat primer coating station, with emissions exhausted to Stack PR-D1.

Under NSPS Subpart RR, the paper coating line (CL-968) is considered an affected facility.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) 8.37 MMBtu/hr natural gas-fired boiler, identified as B-1, constructed in 1999. [326 IAC 6-2-4]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

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

### **B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]**

- (a) This permit, T005-23610-00087, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability [326 IAC 2-7-7]**

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

### **B.5 Severability [326 IAC 2-7-5(5)]**

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

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

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

### **B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The 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 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

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- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) 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.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T005-23610-00087 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12(b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 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

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 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade 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 2-7-20(c).
- (d) Alternative Operating Scenarios Part 70 Operating Permit  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

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

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

**C.2 Opacity [326 IAC 5-1]**

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

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

**C.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 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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, 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 2-7-6(1)]

### C.7 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

### C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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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

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

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

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

**C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall 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 2-7-5][326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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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

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

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, 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 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test Part 70 Operating Permit**

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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

**C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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) One (1) paper coating line, identified as CL-968, constructed in 1999, consisting of the following units:
- (1) One (1) flexographic ink print station, with emissions exhausted to Stack PNT-D1;
  - (2) One (1) roll coat release coating station, with emissions exhausted to Stacks R-1 and R-D1;
  - (3) One (1) die coat adhesive coating station, with emissions exhausted to Stacks ADH-D1, ADH-D2, ADH-D3, and ADH-D4; and
  - (4) One (1) roll coat primer coating station, with emissions exhausted to Stack PR-D1.

Under NSPS Subpart RR, the paper coating line (CL-968) is considered an affected facility.

(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 2-7-5(1)]

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

Pursuant to 326 IAC 8-2-5, the owner or operator shall not discharge into the atmosphere any volatile organic compound (VOC) in excess of thirty five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon) excluding water, delivered to the applicator, from the paper or pressure sensitive tape/labels coating line (CL-968).

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for paper coating line CL-968.

### Compliance Determination Requirements

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

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

#### D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used;
  - (2) The amount of coating material and solvent less water used on monthly basis;

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The volume weighted VOC content of the coatings used for each month; and
- (4) The cleanup solvent usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart RR]**

**D.1.5 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]**

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- (a) The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to paper coating line CL-968, which was constructed in 1999, except when otherwise specified in 40 CFR Part 60, Subpart RR.
- (b) Pursuant to 40 CFR 60.7, the Permittee shall submit all required notifications and reports 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

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

**D.1.6 New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart RR]**

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Pursuant to 40 CFR Part 60, Subpart RR, the Permittee shall comply with the provisions of the New Source Performance Standard (NSPS) for Pressure Sensitive Tape and Labeling Coating Operations for paper coating line CL-968, as specified as follows:

**§ 60.440 Applicability and designation of affected facility.**

- (a) The affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials.
- (b) Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of this subpart. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of this subpart.
- (c) This subpart applies to any affected facility which begins construction, modification, or reconstruction after December 30, 1980.

**§ 60.441 Definitions and symbols.**

(a) Except as otherwise required by the context, terms used in this subpart are defined in the Act, in subpart A of this part, or in this section as follows:

*Coating applicator* means an apparatus used to apply a surface coating to a continuous web.

*Coating line* means any number or combination of adhesive, release, or precoat coating applicators, flashoff areas, and ovens which coat a continuous web, located between a web unwind station and a web rewind station, to produce pressure sensitive tape and label materials.

*Coating solids applied* means the solids content of the coated adhesive, release, or precoat as measured by Method 24.

*Flashoff area* means the portion of a coating line after the coating applicator and usually before the oven entrance.

*Fugitive volatile organic compounds* means any volatile organic compounds which are emitted from the coating applicator and flashoff areas and are not emitted in the oven.

*Hood or enclosure* means any device used to capture fugitive volatile organic compounds.

*Oven* means a chamber which uses heat or irradiation to bake, cure, polymerize, or dry a surface coating.

*Precoat* means a coating operation in which a coating other than an adhesive or release is applied to a surface during the production of a pressure sensitive tape or label product.

*Solvent applied in the coating* means all organic solvent contained in the adhesive, release, and precoat formulations that is metered into the coating applicator from the formulation area.

*Total enclosure* means a structure or building around the coating applicator and flashoff area or the entire coating line for the purpose of confining and totally capturing fugitive VOC emissions.

VOC means volatile organic compound.

(b) All symbols used in this subpart not defined below are given meaning in the Act or in subpart A of this part.

a=the gas stream vents exiting the emission control device.

b=the gas stream vents entering the emission control device.

$C_{aj}$ =the concentration of VOC (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.

$C_{bi}$ =the concentration of VOC (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.

$C_{fk}$ =the concentration of VOC (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.

G=the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month.

$M_{ci}$ =the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records.

$M_r$ =the total mass (kg) of solvent recovered for a calendar month.

$Q_{aj}$ =the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic meters per hour.

$Q_{bi}$ =the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic meters per hour.

$Q_{fk}$ =the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic meters per hour.

R=the overall VOC emission reduction achieved for a calendar month (in percent).

$R_q$ =the required overall VOC emission reduction (in percent).

$W_{oi}$ =the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

$W_{si}$ =the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

**§ 60.442 Standard for volatile organic compounds.**

(a) On and after the date on which the performance test required by §60.8 has been completed each owner or operator subject to this subpart shall:

(1) Cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or

**§ 60.443 Compliance provisions.**

(a) To determine compliance with §60.442 the owner or operator of the affected facility shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

(1) Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

(2) Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^n W_{oi} M_{ci}}{\sum_{i=1}^n W_{si} M_{ci}}$$

(3) For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with §60.442(a)(1).

**§ 60.444 Performance test procedures.**

(a) The performance test for affected facilities complying with §60.442 without the use of add-on controls shall be identical to the procedures specified in §60.443(a).

**§ 60.445 Monitoring of operations and recordkeeping.**

(a) The owner or operator of an affected facility subject to this subpart shall maintain a calendar month record of all coatings used and the results of the reference test method specified in

§60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.

(h) Records of the measurements required in §§60.443 and 60.445 must be retained for at least two years following the date of the measurements.

**§ 60.446 Test methods and procedures.**

(a) The VOC content per unit of coating solids applied and compliance with §60.422(a)(1) shall be determined by either Method 24 and the equations specified in §60.443 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Administrator may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

**§ 60.447 Reporting requirements.**

(a) For all affected facilities subject to compliance with §60.442, the performance test data and results from the performance test shall be submitted to the Administrator as specified in §60.8(a) of the General Provisions (40 CFR part 60, subpart A).

(b) Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator of exceedances of the VOC emission limits specified in §60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(d) The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

#### Insignificant Activity

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) 8.37 MMBtu/hr natural gas-fired boiler, identified as B-1, constructed in 1999.  
[326 IAC 6-2-4]

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

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

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

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Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate matter emissions from the 8.37 MMBtu/hr boiler, identified as B-1, shall not exceed 0.6 lb/MMBtu heat input.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: MACtac  
Source Address: 2576 Norcross Drive, Columbus, Indiana 47201  
Mailing Address: 2576 Norcross Drive, Columbus, Indiana 47201  
Part 70 Permit No.: T005-23610-00087

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

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**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: MACtac  
Source Address: 2576 Norcross Drive, Columbus, Indiana 47201  
Mailing Address: 2576 Norcross Drive, Columbus, Indiana 47201  
Part 70 Permit No.: T005-23610-00087

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MACtac  
 Source Address: 2576 Norcross Drive, Columbus, Indiana 47201  
 Mailing Address: 2576 Norcross Drive, Columbus, Indiana 47201  
 Part 70 Permit No.: T005-23610-00087

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

Page 1 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	MACtac
<b>Source Location:</b>	2576 Norcross Drive, Columbus, Indiana 47201
<b>County:</b>	Bartholomew
<b>SIC Code:</b>	2672
<b>Operation Permit No.:</b>	T005-13881-00087
<b>Operation Permit Issuance Date:</b>	June 19, 2002
<b>Permit Renewal No.:</b>	T005-23610-00087
<b>Permit Reviewer:</b>	Tanya White/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit renewal application from MACtac relating to the operation of a paper coating plant.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) paper coating line, identified as CL-968, constructed in 1999, consisting of the following units:
  - (1) One (1) flexographic ink print station, with emissions exhausted to Stack PNT-D1;
  - (2) One (1) roll coat release coating station, with emissions exhausted to Stacks R-1 and R-D1;
  - (3) One (1) die coat adhesive coating station, with emissions exhausted to Stacks ADH-D1, ADH-D2, ADH-D3, and ADHD4; and
  - (4) One (1) roll coat primer coating station, with emissions exhausted to Stack PR-D1.

Under NSPS Subpart RR, the paper coating line (CL-968) is considered an affected facility.

**Unpermitted Emission Units and Pollution Control Equipment**

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

**Insignificant Activities**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) 8.37 MMBtu/hr natural gas-fired boiler, identified as B-1, constructed in 1999; [326 IAC 6-2-4]

- (2) Two (2) 0.15 MMBtu/hr natural gas-fired space heaters, identified as UH-1 and UH-2;
- (3) One (1) 0.18 MMBtu/hr natural gas-fired unit space heater, identified as UH-3;
- (4) Three (3) 0.06 MMBtu/hr natural gas-fired space heaters, identified as UH-4, UH-5, and UH-6;
- (5) Two (2) 0.4 MMBtu/hr natural gas-fired space heaters, identified as UH-7 and UH-9;
- (6) Two (2) 0.15 MMBtu/hr natural gas-fired air handling units, identified as AHU-1 and AHU-2;
- (7) Two (2) 0.25 MMBtu/hr natural gas-fired air handling units, identified as RTU-1 and RTU-3;
- (8) Two (2) 0.12 MMBtu/hr natural gas-fired air handling units, identified as RTU-2 and RTU-5;
- (9) Two (2) 0.08 MMBtu/hr natural gas-fired air handling units, identified as RTU-4 and RTU-6;
- (10) One (1) 0.2 MMBtu/hr natural gas-fired air handling HVAC unit, identified as ARU-1;
- (11) Two (2) 0.385 MMBtu/hr natural gas-fired air handling HVAC units, identified as MUA-2 and MUA-4;
- (12) Nine (9) 0.2 MMBtu/hr natural gas-fired space heaters, identified as UH-1 through UH-9;
- (13) Four (4) 0.3806 MMBtu/hr natural gas-fired roof top units, identified as RT-1 through RT-4;
- (14) One (1) 0.1621 MMBtu/hr natural gas-fired roof top unit, identified as RT-5;
- (15) The following process heaters are utilized for the paper coating line, identified as CL-968, constructed in 1999:
  - (A) Three (3) natural gas-fired release drying ovens, identified as R-D1, R-D2, and R-D3, each with a design capacity of 6.4 MMBtu/hr, with emissions exhausted to Stacks R-D1;
  - (B) One (1) 1.58 MMBtu/hr natural gas-fired print drying oven, identified as PNT-D1, with emissions exhausted to Stack PNT-D1;
  - (C) Two (2) natural gas-fired adhesive drying ovens, identified as ADH-D1 and ADH-D2, each with a design capacity of 5.5 MMBtu/hr, with emissions exhausted to Stacks ADH-D1 and ADH-D2, respectively;
  - (D) Two (2) natural gas-fired adhesive drying ovens, identified as ADH-D3 and ADH-D4, each with a design capacity of 5.175 MMBtu/hr, with emissions exhausted to Stacks ADH-D3 and ADH-D4, respectively;

- (E) One (1) 5.175 MMBtu/hr natural gas-fired primer drying oven, identified as PR-D1, with emissions exhausted to Stack PR-D1;
- (b) Manual parts cleaning operations using aqueous solutions described as follows:
  - (1) One (1) caustic cleaner, identified as CC-1, with a maximum solvent usage of six (6) gallons per day;
  - (2) One (1) alkaline cleaner, containing glycol ether, identified as CC-2, with a maximum solvent usage of three (3) gallons per day;
  - (3) One (1) alkaline cleaner, containing glycol ether, identified as CC-3, with a maximum solvent usage of five (5) gallons per day;
- (c) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC, all installed in 1999:
  - (1) Four (4) adhesive storage tanks, identified as T-1, T-2, T-3, and T-4, each with a maximum capacity of 6,512 gallons;
  - (2) One (1) 883 gallon silicone emulsion storage tank, identified as T-16;
  - (3) One (1) 1,200 gallon surfactant/water mixture storage tank, identified as T-19;
  - (4) Two (2) 6,500 gallon wastewater storage tanks, identified as T-11 and T-12;
  - (5) One (1) 2,508 gallon adhesive mixing tank, identified as T-13; and
  - (6) Two (2) adhesive feed tanks, identified as T-15 and T-17, each with a maximum capacity of 3,328 gallons.
  - (7) One (1) mixing tank, identified as T-26, with a maximum capacity of 500 gallons.
- (d) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC, all installed between December 2003 and January 2004:
  - (1) Four (4) adhesive storage tanks, identified as T-5, T-6, T-7, and T-8, each with a maximum capacity of 9,122 gallons.

### Existing Approvals

The source has been operating under the following previous approvals:

- (a) Part 70 Operating Permit No.: T005-13881-00087, issued on June 19, 2002;
- (b) First Administrative Amendment No.: 005-18280-00087, issued on January 21, 2004; and
- (c) Second Administrative Amendment No.: 005-20787-00087, issued on August 30, 2005.

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.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Permit renewal be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 Permit renewal application, for the purposes of this review, was received on September 5, 2006, with additional information received on January 19, 2007.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations (Pages 1 through 9).

**Potential to Emit of the Source**

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

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 the original Part 70 Operating Permit 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 <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAPs	Total HAPs
Surface Coating	0.00	0.00	0.00	104.55	0.00	0.00	8.69	20.50
Tanks	0.00	0.00	0.00	2.80	0.00	0.00	0.00	0.00
Parts Cleaning	0.00	0.00	0.00	9.01	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.52	2.09	0.17	1.51	23.10	27.50	0.50	0.52
Total Potential Emissions	0.52	2.02	0.16	117.87	22.36	26.62	< 10	< 25

The potential to emit of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 OAQ emissions data.

Pollutant	Actual Emissions (tons/year)
PM-2.5	0.20
PM-10	0.24
SO <sub>2</sub>	0.02
VOC	7.84
CO	2.65
NO <sub>x</sub>	3.15
HAPs	Not Reported

### County Attainment Status

The source is located in Bartholomew County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

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

- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

- (a) This Part 70 Operating Permit does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:
  - (1) with the potential to emit before controls equal to or greater than the major source threshold,
  - (2) that is subject to an emission limitation or standard, and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to any facility at this source. Although the potential emissions of VOCs from the surface coating operations are greater than major source thresholds the surface coating operations do not utilize a control device to comply with a VOC emission limitation or standard. No other facilities at this source have potential emissions greater than major source thresholds for any regulated pollutant.

- (b) Boiler 1 is not subject to the requirements of the New Source Performance Standard (40 CFR 60, Subpart Dc) because the boiler has a maximum heat input capacity of less than 10 MMBtu/hr. Therefore, the requirements of 40 CFR 60, Subpart Dc are not included in this permit.
- (c) Boiler 1 is not subject to the requirements of the New Source Performance Standard (40 CFR 60, Subpart D) because the boiler has a maximum heat input capacity of less than 250 MMBtu/hr. Therefore, the requirements of 40 CFR 60, Subpart D are not included in this permit.
- (d) Boiler 1 is not subject to the requirements of the New Source Performance Standard (40 CFR 60, Subpart Da) because the boiler has a maximum heat input capacity of less than 250 MMBtu/hr. Therefore, the requirements of 40 CFR 60, Subpart Da are not included in this permit.

- (e) Boiler 1 is not subject to the requirements of the New Source Performance Standard (40 CFR 60, Subpart Db) because the boiler has a maximum heat input capacity of less than 100 MMBtu/hr. Therefore, the requirements of 40 CFR 60, Subpart Db are not included in this permit.
- (f) The storage tanks (T-1, T-2, T-3, T-4, T-5, T-6, T-7, T-8, T-11, T-12, T-13, T-15, T-16, T-17, T-19, and T-26) are not subject to the New Source Performance Standard (40 CFR Part 60.110, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" (Including Petroleum Liquid Storage Vessels). This rule applies to Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984 with a storage capacity greater than 75 cubic meters (m<sup>3</sup>) (19,812 gallons). Each storage tank has a capacity of less than 19,812 gallons; Therefore, this rule is not included in this permit.
- (g) The flexographic ink print station is not subject to 40 CFR 60.430 through 60.435, Subpart QQ, Standards of Performance for the Graphics Arts Industry: Publication Rotogravure Printing. This rule applies to publication rotogravure printing presses for which Construction, Reconstruction, or Modification commenced after October 28, 1980. The source does not have any publication rotogravure printing presses as defined in 40 CFR 60.431(a), therefore, this rule is not included in this permit.
- (h) Provisions of 326 IAC 12, 40 CFR 60.440 - 60.447, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Labeling Coating Operations applies to each coating line used in the manufacture of pressure sensitive tapes and labeling materials, which inputs to the coating process in excess of 45 Mg of VOC per 12 month period and commenced construction, reconstruction, or modification after December 30, 1980. The printing operation, identified as CL-968, was constructed in 1999 and manufactures pressure sensitive tapes and labeling materials, which inputs to the coating process in excess of 45 Mg of VOC per 12 month period, therefore, Subpart RR applies. The format for incorporating the requirements of 40 CFR 60, Subpart RR is being revised in this permit renewal.

The printing operations are subject to the following portions of 40 CFR 60, Subpart RR:

- (1) 40 CFR 60.440.
- (2) 40 CFR 60.441.
- (3) 40 CFR 60.442(a)(1).
- (4) 40 CFR 60.443(a).
- (5) 40 CFR 60.444(a).
- (6) 40 CFR 60.445(a).
- (7) 40 CFR 60.445(h).
- (8) 40 CFR 60.446(a).
- (9) 40 CFR 60.447(a).
- (10) 40 CFR 60.447(b).
- (11) 40 CFR 60.447(d).

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1-1, apply to the paper surface coating operations, identified as CL-968, described in this section except when otherwise specified in 40 CFR 60, Subpart RR.

- (i) The degreasers are not subject to National Emissions Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 63.460, Subpart T because the degreasers do not use any halogenated solvent cleaners. Therefore, the rule is not included in this permit.

- (j) The flexographic ink print station is not subject to 40 CFR 63, Subpart KK, National Emissions Standards for the Printing and Publishing Industry. This rule applies to each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. Pursuant to 40 CFR 63.820(a)(1), the requirements of this rule are not applicable to the flexographic ink print station because this source is a minor source of HAPs. Therefore, this rule is not included in this permit.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, (40 CFR 63, Subpart JJJJ) are not included for the paper coating line, identified as CL-968 because pursuant to 40 CFR 63.3290 this regulation is not applicable to minor sources of HAPs. Therefore, this rule is not included in this permit.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD) are not included for the one (1) boiler and process heaters at this source because the requirements of 40 CFR 63, Subpart DDDDD are not applicable to sources that are minor sources of HAPs as defined in 40 CFR 63.2 or 40 CFR 63.761. Therefore, the requirements of 40 CFR 63, Subpart DDDDD are not included in this permit.
- (m) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20, 40 CFR Part 61, and 40 CFR Part 63) included in this permit.

#### **State Rule Applicability – Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration, PSD)**

This source is not considered a major source because it is not one of the 28 listed source categories and the uncontrolled potential to emit of PM, PM-10, CO, VOC, SO<sub>2</sub> and NO<sub>x</sub> are less than 250 tons per year and the source has not had any many major modifications under PSD. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

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

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3(b)(3), an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The source is required to submit triennial emissions reports rather than annual emissions reports because the source-wide potential emissions of NO<sub>x</sub>, CO, and SO<sub>2</sub> are each less than 2,500 tons per year. Additionally, source-wide potential emissions of VOC and PM-10 are each less than 250 tons per year.

##### **326 IAC 5-1 (Opacity Limitations)**

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

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

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

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

The operation of this source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**State Rule Applicability – Individual Facilities**

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

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

The emission limit for the boiler is based on the lesser of the following equation or 0.6 lb/MMBtu:

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

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input  
Q = total source maximum indirect heater input = 8.37 MMBtu/hr

$$Pt = 1.09/8.37^{0.26} = 0.627 \text{ lbs PM/MMBtu}$$

Therefore, the PM emissions from the one (1) boiler, identified as B-1, rated at 8.37 MMBtu per hour heat input, shall be not exceed 0.6 pounds per MMBtu heat input.

The estimated PM emissions from boiler 1 are 0.002 lb PM/MMBtu, which is less than the limit of 0.6 lb/MMBtu. Therefore, boiler 1 is able to comply with this rule.

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

The paper coating operation is not subject to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes - Surface Coating Operations). This rule establishes emissions limitations for particulate emissions from process operations located anywhere in the state. In accordance with 326 IAC 6-3-1(b)(6) the paper coating operation, which uses a roll coating application method, is exempt from the requirements of 326 IAC 6-3-2.

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

The paper coating operation is subject to 326 IAC 8-2-5, (Paper Coating Operations). This rule establishes limitations for web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels regardless of substrate. This source performs coating operations for paper and pressure sensitive tape/labels. Therefore, the requirements of 326 IAC 8-2-5 apply. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coatings applied to labels of any substrate, or pressure sensitive tapes, or paper, plastic or metal foil by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating less water delivered to the applicator. The calculations (Appendix A: page 2 of 9) based on information provided by the source indicate that the paper coating operations use coating materials in compliance with the requirements of 326 IAC 8-2-5.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The storage tanks, which were constructed after January 1, 1980 and are located in Bartholomew County, are not subject to 326 IAC 8-4-3 because the storage tanks are used to store coating materials and not petroleum liquids.

#### 326 IAC 8-3 (Degreasing Operations)

Pursuant to 326 IAC 8-1-1 the Parts Cleaners, identified as CC-1, CC-2 and CC-3, are not subject to the requirements of 326 IAC 8-3. This rule applies to facilities performing organic solvent degreasing operations located anywhere in the state. The cleaners at this source are aqueous solutions and actual VOC emissions for these operations are less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-3 do not apply.

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

Pursuant to 326 IAC 8-1-1 the Parts Cleaners, identified as CC-1, CC-2 and CC-3, are not subject to the requirements of 326 IAC 8-3-5. This rule applies to facilities performing organic solvent degreasing operations located anywhere in the state. The cleaners at this source are aqueous solutions and actual VOC emissions for these operations are less than 15 pounds per day; Therefore the requirements of 326 IAC 8-3-5 do not apply.

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

The requirements of 326 IAC 8-1-6 are applicable to facilities constructed after January 1, 1980 and which have the potential to emit of 25 tons per year or more of VOCs. The paper coating line, identified as CL-968, was constructed after January 1, 1980 and has the potential to emit of greater than 25 tons per year of VOCs. However, the paper coating line is subject to 326 IAC 8-2-5 (Paper Coating Operations) and therefore CL-968 is not subject to this rule. No other emission units are subject to this rule because each emission unit has the potential to emit of less than 25 tons per year.

There are no other Article 8 (326 IAC 8) rules applicable to this source.

### **Testing Requirements**

The Permittee is required to do performance tests for the pressure sensitive tape and label coating line using procedures specified in the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR 60, Subpart RR) in accordance with 40 CFR 60.446(a) to demonstrate compliance with the VOC content per unit of coating solids limit pursuant to 40 CFR 60.442(a).

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The paper coating line, identified as CL-968, is subject to the compliance monitoring requirements of 40 CFR 60, Subpart RR, which involves monitoring and maintaining records of the coating usage per calendar month.

## **Conclusion**

The operation of this paper coating (pressure sensitive laminates) manufacturing plant shall be subject to the conditions of this Part 70 Permit T005-23610-00087.

## Appendix A: Emission Calculations

**Company Name:** MACtac  
**Address:** 2576 Norcross Drive, Columbus, IN 47201  
**Permit No.:** T005-23610-00087  
**Reviewer:** Tanya White/EVP  
**Date:** May-07

### Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Tank Emissions	Parts Cleaning	Surface Coating	Total
PM	0.52	0.00	0.00	0.00	0.52
PM10	2.09	0.00	0.00	0.00	2.09
SO <sub>2</sub>	0.17	0.00	0.00	0.00	0.17
NO <sub>x</sub>	27.50	0.00	0.00	0.00	27.50
VOC	1.51	2.80	9.01	104.55	117.87
CO	23.10	0.00	0.00	0.00	23.10
total HAPs	0.52	Negl.	Negl.	20.50	21.02
worst case single HAP	0.50	Negl.	Negl.	8.69	8.69
	Hexane			Ethyl Benzene	Ethyl Benzene

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

### Limited/Controlled Potential Emissions (tons/year)

Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Tank Emissions	Parts Cleaning	Surface Coating	Total
PM	0.52	0.00	0.00	0.00	0.52
PM10	2.09	0.00	0.00	0.00	2.09
SO <sub>2</sub>	0.17	0.00	0.00	0.00	0.17
NO <sub>x</sub>	27.50	0.00	0.00	0.00	27.50
VOC	1.51	2.80	9.01	104.55	117.87
CO	23.10	0.00	0.00	0.00	23.10
total HAPs	0.52	0.00	0.00	20.50	21.02
worst case single HAP	0.50	0.00	0.00	8.69	8.69
	Hexane			Ethyl Benzene	Ethyl Benzene

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

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

**Company Name: MACTac  
Address: 2576 Norcross Drive, Columbus, IN 47201  
Permit No.: T005-23610-00087  
Reviewer: Tanya White/EVP  
Date: May-07**

Operation	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Adhesive Coat Station	8.5	44.76%	44.69%	0.07%	44.22%	55.24%	0.00624	84,780	0.01	0.01	3.14	75.47	13.77	0.00	0.01	100%
Release Coat Station	8.6	7.10%	0.00%	7.10%	0.00%	92.90%	0.00027	84,780	0.61	0.61	14.09	338.26	61.73	0.00	0.66	100%
Primer Topcoat Station	8.3	59.10%	56.79%	2.31%	56.22%	40.90%	0.00039	84,780	0.44	0.19	6.33	151.80	27.70	0.00	0.47	100%
Ink Station	8.6	73.23%	72.71%	0.52%	52.60%	26.77%	0.00008	84,780	0.09	0.04	0.31	7.34	1.34	0.00	0.17	100%

**Potential Emissions (tons/yr) =**

**23.87      572.86      104.55      0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** MACtac  
**Address:** 2576 Norcross Drive, Columbus, IN 47201  
**Permit No.:** T005-23610-00087  
**Reviewer:** Tanya White/EVP  
**Date:** May-07

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Acetaldehyde	Weight % Ethyl Benzene	Weight % Vinyl Acetate	Acetaldehyde (ton/yr)	Ethyl Benzene (ton/yr)	Vinyl Acetate (ton/yr)
Adhesive Coat Station	8.5	0.00624	84,780	0.0400%	0.00%	0.0200%	7.87	0.00	3.94
Release Coat Station	8.6	0.00027	84,780	0.00%	1.00%	0.00%	0.00	8.69	0.00
Primer Topcoat Station	8.3	0.00039	84,780	0.00%	0.00%	0.00%	0.00	0.00	0.00
Ink Station	8.6	0.00008	84,780	0.00%	0.00%	0.00%	0.00	0.00	0.00

**Potential Emissions (tons/yr) =**

**7.87                      8.69                      3.94**

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
VOC Emissions**

**Company Name:** MACtac  
**Address:** 2576 Norcross Drive, Columbus, IN 47201  
**Permit No.:** T005-23610-00087  
**Reviewer:** Tanya White/EVP  
**Date:** May-07

**Tank Emissions**

Emission Unit	Contents	Capacity (gal)	Throughput (gal/yr)	Potential VOC Emissions (ton/year)
T-1, T-2, T-3, & T-4	Water Adhesive	6,512 each	5,000,000 total	0.78
T-5, T-6, T-7, & T-8	Water Adhesive	9,122 each	5,000,000 total	0.93
T-11 & T-12	Waste Water	6,500 each	120,000 total	0.06
T-13	Emulsion Adhesive (mix)	2,508	5000000	0.41
T-16	Silicone Emulsion	883	883	0.03
T-15 & T-17	Emulsion Adhesive (feed)	3,328 each	5,000,000 total	0.55
T-19	Surfactant/Water	1200	350000	0.04
T-26	Water Adhesive	500	N/A	0.00
<b>Total =</b>				<b>2.80</b>

**Note:**

The potential to emit was calculated using the U.S. E.P.A.'s TANKS Program, 4.09d.

**Appendix A: Emission Calculations**  
**VOC Emissions**

**Company Name:** MACtac  
**Address:** 2576 Norcross Drive, Columbus, IN 47201  
**Permit No.:** T005-23610-00087  
**Reviewer:** Tanya White/EVP  
**Date:** May-07

**Parts Cleaning Units**

Emission Unit	Maximum Rate (gals/hr)	VOC Density (lbs VOC/gal)	Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (ton/year)
CC1	0.25	4.50	1.13	4.93
CC2	0.13	6.77	0.85	3.71
CC3	0.21	0.41	0.09	0.37
			<b>Total =</b>	<b>9.01</b>

**Note:**

VOC (tons/yr) = Max. Usage (gals/hr) \* VOC Density (lbs VOC/gal) \* 8760 (hrs/yr) \* 1/2000 (tons/lb)

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MMBTU/HR <100**

**Space Heaters, Air Handling Units, and Roof Top Units**

**Company Name: MACtac**

**Address: 2576 Norcross Drive, Columbus, IN 47201**

**Permit No.: T005-23610-00087**

**Reviewer: Tanya White/EVP**

**Date: May-07**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

54.420

476.715

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	100.0 **see below	5.5	84.0
	0.5	1.8	0.1	23.8	1.3	20.0

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

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAP emissions calculations.

**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MMBTU/HR <100****Space Heaters, Air Handling Units, and Roof Top Units****HAPs Emissions****Company Name: MACtac****Address: 2576 Norcross Drive, Columbus, IN 47201****Permit No.: T005-23610-00087****Reviewer: Tanya White/EVP****Date: May-07****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.006E-04	2.860E-04	1.788E-02	4.290E-01	8.104E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.192E-04	2.622E-04	3.337E-04	9.058E-05	5.006E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MMBTU/HR <100**  
**Small Industrial Boiler**

**Company Name: MACtac**  
**Address: 2576 Norcross Drive, Columbus, IN 47201**  
**Permit No.: T005-23610-00087**  
**Reviewer: Tanya White/EVP**  
**Date: May-07**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

8.4

73.3

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.07	0.28	0.02	3.67	0.20	3.08

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAP emissions calculations.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MMBTU/HR <100**  
**Small Industrial Boiler**  
**HAP Emissions**

**Company Name: MACtac**  
**Address: 2576 Norcross Drive, Columbus, IN 47201**  
**Permit No.: T005-23610-00087**  
**Reviewer: Tanya White/EVP**  
**Date: May-07**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.699E-05	4.399E-05	2.750E-03	6.599E-02	1.246E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.833E-05	4.033E-05	5.132E-05	1.393E-05	7.699E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above. Additional HAP emission factors are available in AP-42, Chapter 1.4.