



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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(317) 232-8603
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TO: Interested Parties / Applicant
DATE: November 14, 2007
RE: Rieke Packaging Systems / 033-24328-00023
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT OFFICE OF AIR QUALITY

**Rieke Packaging Systems
500 West 7th Street
Auburn, Indiana 46706**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F033-24328-00023	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 14, 2007 Expiration Date: November 14, 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 2-8-3(b)]

The Permittee owns and operates a stationary steel and plastic drum closure products manufacturing plant.

Source Address:	500 West 7th Street, Auburn, Indiana 46706
Mailing Address:	500 West 7th Street, Auburn, Indiana 46706
General Source Phone Number:	(260) 925-3700
SIC Code:	3499, 3089
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) HVLP paint spray booth operation for coating metal parts, identified as EU 001, with a maximum capacity of 6,200 units per hour, using a waterwash curtain for particulate control, exhausting through Stack No. 1, and installed in 1968.
- (b) One (1) HVLP paint spray booth operation for coating metal parts, identified as EU 005a, with a maximum capacity of 3,000 units per hour, using dry filters for particulate control, exhausting through Stack No. 5, and installed in 2003.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) wheelabrator, with a maximum capacity of 1,643 lbs/hr of steel, using a baghouse with an outlet grain loading of 0.005 grains/acf and an air flowrate of less than 4,000 acfm as particulate control. [326 IAC 6-3-2]
- (b) Two (2) natural gas-fired boilers, with a maximum heat input capacity of 5.0 MMBtu/hr each, and installed in 1954. [326 IAC 6-2-4]
- (c) One (1) natural gas-fired preheat oven, identified as EU 005b, with a maximum heat input capacity of 0.5 MMBtu/hr, and installed in 2003.
- (d) One (1) natural gas-fired bake oven, identified as EU 005c, with a maximum heat input capacity of 0.8 MMBtu/hr, and installed in 2003.
- (e) One (1) natural gas-fired cure oven with a maximum heat input capacity of 2.5 MMBtu/hr.

- (f) One (1) natural gas-fired sludge dryer with a maximum heat input capacity of 3.0 MMBtu/hr.
- (g) One (1) natural gas-fired heater make up air unit with a maximum heat input capacity of 1.75 MMBtu/hr.
- (h) One (1) MEK storage tank, with a capacity of 4,500 gallons and an annual throughput of less than 11,700 gallons per year.
- (i) One (1) above ground gasoline storage tank with a capacity of 300 gallons and an annual throughput of less than 3,600 gallons per year.
- (j) Rubber extruding operations.
- (k) Activities or emission units:
 - (1) not regulated by a NESHAP, whose potential uncontrolled emissions are equal to or less than one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs.
 - (2) for which the potential uncontrolled emissions meet the exemption levels specified below:
 - (A) For volatile organic compounds (VOC), the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
 - (B) For an emission unit or activity with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM-10), the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.
- (l) Water related activities including:
 - (1) Production of hot water for on-site personal use not related to any industrial or production process.
 - (2) Steam traps, vents, leaks and safety relief valves.
 - (3) Boiler water treatment operations, not including cooling towers.
- (m) Combustion activities including the following:
 - (1) Portable electrical generators that can be moved by hand from one location to another. "Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
 - (2) Tobacco smoking rooms and areas.
- (n) Ventilation and venting related equipment including the following:
 - (1) Ventilation exhausts, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants.
 - (2) Stacks and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste.
 - (3) Air vents from air compressors.

- (o) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following:
 - (1) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents.
 - (2) Brazing, soldering, or welding operations and associated equipment.
 - (3) Batteries and battery charging stations, except at battery manufacturing plants.
 - (4) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations.
 - (5) Tarring, retarring, and repair of building roofs.
 - (6) Instrument air dryer and filter maintenance.

- (p) Activities performed using hand-held equipment including the following:
 - (1) Application of hot melt adhesives with no VOC in the adhesive formulation.
 - (2) Buffing.
 - (3) Cutting, excluding cutting torches.
 - (4) Drilling.
 - (5) Grinding.
 - (6) Machining wood, metal, or plastic.
 - (7) Polishing.
 - (8) Sanding.
 - (9) Sawing.
 - (10) Turning wood, metal, or plastic.
 - (11) Surface grinding.
 - (12) Routing.
 - (13) Carving.

- (q) Housekeeping and janitorial activities and supplies including the following:
 - (1) Rest rooms and associated cleanup operations and supplies.
 - (2) Mobile floor sweepers and floor scrubbers.
 - (3) Pest control fumigation.

- (r) Office related activities including the following:
 - (1) Office supplies and equipment.
 - (2) Photocopying equipment and associated supplies.
 - (3) Paper shredding.
 - (4) Blueprint machines, photographic equipment, and associated supplies.

- (s) Emergency and standby equipment including:
 - (1) Emergency (backup) electrical generators at residential locations.
 - (2) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares.
 - (3) Activities and equipment associated with on-site medical care not otherwise specifically regulated.

- (t) Sampling and testing equipment and activities including the following:
 - (1) Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
 - (2) Sampling activities including:
 - (a) Sampling of waste.
 - (3) Instrument air dryers and distribution.
- (u) Activities associated with production including the following:
 - (1) Closed, non-vented, tumblers used for cleaning or deburring metal products without abrasive blasting.
 - (2) Electrical resistance welding.
 - (3) Application equipment for hot melt adhesives with no VOC in the adhesive formulation.
 - (4) Drop hammers or hydraulic presses for forging or metalworking.
 - (5) Air compressors and pneumatically operated equipment, including hand tools.
 - (6) Compressor or pump lubrication and seal oil systems.
 - (7) Equipment for washing or drying fabricated glass or metal products, if no VOCs or HAPs are used in the process, and no gas, oil or solid fuel is burned.
 - (8) Handling of solid steel, including coils and slabs, excluding scrap burning, scarfing, and charging into steel making furnaces and vessels.
- (v) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including the following:
 - (1) Equipment used for surface coating, painting, dipping or spraying operation, except those that will emit VOCs or HAPs.
 - (2) Electric or steam heated drying ovens and autoclaves, including only the heating emissions and not any associated process emissions.
 - (3) Manual loading and unloading operations.
 - (4) Mechanical equipment gear boxes and vents which are isolated from process materials.
 - (5) Non-volatile mold release waxes and agents.
- (w) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons, including:
 - (i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (x) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (y) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (z) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:

- (1) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F); or
 - (B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (aa) Closed loop heating and cooling systems.
- (bb) Infrared cure equipment.
- (cc) Exposure chambers (towers or columns) for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.
- (dd) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under control of the owner/operator, that is, an on-site sewage treatment facility.
- (ee) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (ff) Quenching operations used with heat treating processes.
- (gg) Repair activities, including the following:
 - (i) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
 - (ii) Heat exchanger cleaning and repair.
- (hh) Conveyors as follows:
 - (i) Enclosed systems for conveying plastic raw materials and plastic finished goods.
 - (ii) One (1) zinc electroplating operation, installed in 1968, consisting of the following:
 - (1) An alkaline non-cyanide zinc bath, with a maximum capacity of 25,000 units per hour, exhausting through Stacks No. 5 and No. 6.
 - (2) Mist eliminator for south plater.
 - (3) Plater scrubber.
 - (4) Mist eliminator north plater.
 - (5) Alkaline zinc plater.
 - (6) One (1) bulk HCl 6,000 gallon storage tank with an annual throughput of less than 200,000.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, F033-24328-00023, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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

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

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

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Northern Regional Office Telephone Number: (574) 245-4870
Northern Regional Office Facsimile Number: (574) 245-4877

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F033-24328-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3.

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

Ambient Monitoring Requirements [326 IAC 7-3]

C.20 Ambient Monitoring [326 IAC 7-3]

- (a) The Permittee shall operate continuous ambient sulfur dioxide air quality monitors and a meteorological data acquisition system according to a monitoring plan submitted to the commissioner for approval. The monitoring plan shall include requirements listed in 326 IAC 7-3-2(a)(1), 326 IAC 7-3-2(a)(2) and 326 IAC 7-3-2(a)(3).
- (b) The Permittee and other operators subject to the requirements of this rule, located in the same county, may submit a joint monitoring plan to satisfy the requirements of this rule. [326 IAC 7-3-2(c)]
- (c) The Permittee may petition the commissioner for an administrative waiver of all or some of the requirements of 326 IAC 7-3 if such owner or operator can demonstrate that ambient monitoring is unnecessary to determine continued maintenance of the sulfur dioxide ambient air quality standards in the vicinity of the source. [326 IAC 7-3-2(d)]

SECTION D.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) HVLP paint spray booth operation for coating metal parts, identified as EU 001, with a maximum capacity of 6,200 units per hour, using a waterwash curtain for particulate control, exhausting through Stack No. 1, and installed in 1968.
- (b) One (1) HVLP paint spray booth operation for coating metal parts, identified as EU 005a, with a maximum capacity of 3,000 units per hour, using dry filters for particulate control, exhausting through Stack No. 5, and installed in 2003.

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

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

D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from surface coating booth EU 001 shall be controlled by a waterwash curtain and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(d), particulate from surface coating booth EU 005a shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.2 FESOP Limits (VOCs) [326 IAC 2-8-4]

The total combined usage of VOCs in surface coating booths EU 001 and EU 005a, including coatings, dilution solvents, and cleaning solvents shall be less than 75 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the VOC emissions from all other emission units at the source, shall limit the source-wide potential to emit of VOCs to less than 100 tons per year, shall satisfy the requirements of 326 IAC 2-8-4 (FESOP), and render 326 IAC 2-7 (Part 70 Program) not applicable.

D.1.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere, from surface coating booth EU 005a, VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of surface coating booth EU 005a during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for surface coating booths EU 001 and EU 005a and any control devices.

Compliance Determination Requirements

D.1.6 Particulate Control

- (a) In order to comply with D.1.1(a), the waterwash curtain for particulate control shall be in operation and control emissions from surface coating booth EU 001 at all times that surface coating booth EU 001 is in operation.
- (b) In order to comply with D.1.1(b), the dry filters for particulate control shall be in operation and control emissions from surface coating booth EU 005a at all times that surface coating booth EU 005a is in operation.

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage and/or VOC content requirements in Conditions D.1.2 and D.1.3 for surface coating booths EU 001 and EU 005a shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.8 Monitoring

- (a) Surface coating booth EU 001 has applicable compliance monitoring requirements as specified below:
 - (1) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Screens in the wash water scrubbing system shall be maintained to prevent a reduction in the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify the condition of the baffles meet the recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stack (Stack No. 1) while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Surface coating booth EU 005a has applicable compliance monitoring requirements as specified below:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (Stack No. 5) while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, 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, VOC content limits, and/or the VOC emission limits established in Conditions D.1.2 and D.1.3.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used less water 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 cleanup solvent usage for each month.
 - (4) The total VOC usage for each month.
- (b) To document compliance with Condition D.1.8(a) for surface coating booth EU 001, the Permittee shall maintain a log of weekly overspray observations, daily inspections of the water level in the pans, weekly inspections of the condition of the baffle panels, and monthly inspections.
- (c) To document compliance with Condition D.1.8(b) for surface coating booth EU 005a, the Permittee shall maintain a log of weekly overspray observations, daily inspections of the dry filters, and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

- (a) One (1) wheelabrator, with a maximum capacity of 1,643 lbs/hr of steel, using a baghouse with a outlet grain loading of 0.005 grains/acf and an air flowrate of less than 4,000 acfm as particulate control. [326 IAC 6-3-2]
- (b) Two (2) natural gas-fired boilers, with a maximum heat input capacity of 5.0 MMBtu/hr each, and installed in 1954. [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 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate (PM) emission rate from the wheelabrator shall not exceed 3.59 pounds per hour when operating at a process weight rate of 0.82 tons per hour.

This pounds per hour limitation was calculated using the following equation:

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

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

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

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the two (2) natural gas-fired boilers, installed in 1954, shall not exceed 0.8 pounds per MMBtu heat input each.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with D.2.1, the baghouse for particulate control shall be in operation and control emissions from the wheelabrator all times that the wheelabrator is in operation.

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

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

Source Name: Rieke Packaging Systems
Source Address: 500 West 7th Street, Auburn, Indiana 46706
Mailing Address: 500 West 7th Street, Auburn, Indiana 46706
FESOP Permit No.: F033-24328-00023

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Rieke Packaging Systems
Source Address: 500 West 7th Street, Auburn, Indiana 46706
Mailing Address: 500 West 7th Street, Auburn, Indiana 46706
FESOP Permit No.: F033-24328-00023

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Rieke Packaging Systems
Source Address: 500 West 7th Street, Auburn, Indiana 46706
Mailing Address: 500 West 7th Street, Auburn, Indiana 46706
FESOP Permit No.: F033-24328-00023
Facility: Surface coating booths EU 001 and EU 005a
Parameter: VOC usage
Limit: The total combined usage of VOCs in surface coating booths EU 001 and EU 005a, including coatings, dilution solvents, and cleaning solvents shall be less than 75 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Rieke Packaging Systems
 Source Address: 500 West 7th Street, Auburn, Indiana 46706
 Mailing Address: 500 West 7th Street, Auburn, Indiana 46706
 FESOP Permit No.: F033-24328-00023

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Rieke Packaging Systems
Source Location:	500 West 7th Street, Auburn, Indiana 46706
County:	Dekalb
SIC Code:	3499 and 3089
Permit Renewal No.:	F033-24328-00023
Permit Reviewer:	Tanya White/EVP

The Office of Air Quality (OAQ) has reviewed an operating permit application from Rieke Packaging Systems relating to the operation of a steel and plastic drum closure products manufacturing plant.

History

On February 16, 2007, Rieke Packaging Systems submitted an application to the OAQ requesting to renew its Part 70 Operating Permit. Rieke Packaging Systems was issued a Part 70 Operating Permit (No.: T033-7140-00023) on November 22, 2002. During the review process Rieke Packaging Systems requested to transition its Part 70 Operating Permit to a Federally Enforceable State Operating Permit (FESOP).

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) HVLP paint spray booth operation for coating metal parts, identified as EU 001, with a maximum capacity of 6,200 units per hour, using a waterwash curtain for particulate control, exhausting through Stack No. 1, and installed in 1968.
- (b) One (1) HVLP paint spray booth operation for coating metal parts, identified as EU 005a, with a maximum capacity of 3,000 units per hour, using dry filters for particulate control, exhausting through Stack No. 5, and installed in 2003.

Insignificant Activities

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

- (a) One (1) wheelabrator, with a maximum capacity of 1,643 lbs/hr of steel, using a baghouse with an outlet grain loading of 0.005 grains/acf and an air flowrate of less than 4,000 acfm as particulate control. [326 IAC 6-3-2]
- (b) Two (2) natural gas-fired boilers, with a maximum heat input capacity of 5.0 MMBtu/hr each, and installed in 1954. [326 IAC 6-2-4]
- (c) One (1) natural gas-fired preheat oven, identified as EU 005b, with a maximum heat input capacity of 0.5 MMBtu/hr, and installed in 2003.

- (d) One (1) natural gas-fired bake oven, identified as EU 005c, with a maximum heat input capacity of 0.8 MMBtu/hr, and installed in 2003.
- (e) One (1) natural gas-fired cure oven with a maximum heat input capacity of 2.5 MMBtu/hr.
- (f) One (1) natural gas-fired sludge dryer with a maximum heat input capacity of 3.0 MMBtu/hr.
- (g) One (1) natural gas-fired heater make up air unit with a maximum heat input capacity of 1.75 MMBtu/hr.
- (h) One (1) MEK storage tank, with a capacity of 4,500 gallons and an annual throughput of less than 11,700 gallons per year.
- (i) One (1) above ground gasoline storage tank with a capacity of 300 gallons and an annual throughput of less than 3,600 gallons per year.
- (j) Rubber extruding operations.
- (k) Activities or emission units:
 - (1) not regulated by a NESHAP, whose potential uncontrolled emissions are equal to or less than one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs.
 - (2) for which the potential uncontrolled emissions meet the exemption levels specified below:
 - (A) For volatile organic compounds (VOC), the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
 - (B) For an emission unit or activity with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM-10), the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.
- (l) Water related activities including:
 - (1) Production of hot water for on-site personal use not related to any industrial or production process.
 - (2) Steam traps, vents, leaks and safety relief valves.
 - (3) Boiler water treatment operations, not including cooling towers.
- (m) Combustion activities including the following:
 - (1) Portable electrical generators that can be moved by hand from one location to another. "Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
 - (2) Tobacco smoking rooms and areas.

- (n) Ventilation and venting related equipment including the following:
 - (1) Ventilation exhausts, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants.
 - (2) Stacks and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste.
 - (3) Air vents from air compressors.

- (o) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following:
 - (1) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents.
 - (2) Brazing, soldering, or welding operations and associated equipment.
 - (3) Batteries and battery charging stations, except at battery manufacturing plants.
 - (4) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations.
 - (5) Tarring, retarring, and repair of building roofs.
 - (6) Instrument air dryer and filter maintenance.

- (p) Activities performed using hand-held equipment including the following:
 - (1) Application of hot melt adhesives with no VOC in the adhesive formulation.
 - (2) Buffing.
 - (3) Cutting, excluding cutting torches.
 - (4) Drilling.
 - (5) Grinding.
 - (6) Machining wood, metal, or plastic.
 - (7) Polishing.
 - (8) Sanding.
 - (9) Sawing.
 - (10) Turning wood, metal, or plastic.
 - (11) Surface grinding.
 - (12) Routing.
 - (13) Carving.

- (q) Housekeeping and janitorial activities and supplies including the following:
 - (1) Rest rooms and associated cleanup operations and supplies.
 - (2) Mobile floor sweepers and floor scrubbers.
 - (3) Pest control fumigation.

- (r) Office related activities including the following:
 - (1) Office supplies and equipment.
 - (2) Photocopying equipment and associated supplies.
 - (3) Paper shredding.
 - (4) Blueprint machines, photographic equipment, and associated supplies.

- (s) Emergency and standby equipment including:
 - (1) Emergency (backup) electrical generators at residential locations.
 - (2) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares.
 - (3) Activities and equipment associated with on-site medical care not otherwise specifically regulated.

- (t) Sampling and testing equipment and activities including the following:
 - (1) Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
 - (2) Sampling activities including:
 - (a) Sampling of waste.
 - (3) Instrument air dryers and distribution.

- (u) Activities associated with production including the following:
 - (1) Closed, non-vented, tumblers used for cleaning or deburring metal products without abrasive blasting.
 - (2) Electrical resistance welding.
 - (3) Application equipment for hot melt adhesives with no VOC in the adhesive formulation.
 - (4) Drop hammers or hydraulic presses for forging or metalworking.
 - (5) Air compressors and pneumatically operated equipment, including hand tools.
 - (6) Compressor or pump lubrication and seal oil systems.
 - (7) Equipment for washing or drying fabricated glass or metal products, if no VOCs or HAPs are used in the process, and no gas, oil or solid fuel is burned.
 - (8) Handling of solid steel, including coils and slabs, excluding scrap burning, scarfing, and charging into steel making furnaces and vessels.

- (v) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including the following:
 - (1) Equipment used for surface coating, painting, dipping or spraying operation, except those that will emit VOCs or HAPs.
 - (2) Electric or steam heated drying ovens and autoclaves, including only the heating emissions and not any associated process emissions.
 - (3) Manual loading and unloading operations.
 - (4) Mechanical equipment gear boxes and vents which are isolated from process materials.
 - (5) Non-volatile mold release waxes and agents.

- (w) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons, including:
 - (i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- (x) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

- (y) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (z) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:
 - (1) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F); or
 - (B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (aa) Closed loop heating and cooling systems.
- (bb) Infrared cure equipment.
- (cc) Exposure chambers (towers or columns) for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.
- (dd) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under control of the owner/operator, that is, an on-site sewage treatment facility.
- (ee) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (ff) Quenching operations used with heat treating processes.
- (gg) Repair activities, including the following:
 - (i) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
 - (ii) Heat exchanger cleaning and repair.
- (hh) Conveyors as follows:
 - (i) Enclosed systems for conveying plastic raw materials and plastic finished goods.
 - (ii) One (1) zinc electroplating operation, installed in 1968, consisting of the following:
 - (1) An alkaline non-cyanide zinc bath, with a maximum capacity of 25,000 units per hour, exhausting through Stacks No. 5 and No. 6.
 - (2) Mist eliminator for south plater.
 - (3) Plater scrubber.
 - (4) Mist eliminator north plater.
 - (5) Alkaline zinc plater.
 - (6) One (1) bulk HCl 6,000 gallon storage tank with an annual throughput of less than 200,000.

Existing Approvals

Since the issuance of Part 70 Operating Permit No.: T033-7140-00023 by IDEM, OAQ on November 22, 2002, the source has constructed or has been operating under the following approvals:

- (a) First Minor Source Modification No.: 033-16932-00023 issued on May 5, 2003;
- (b) First Minor Permit Modification No.: 033-17469-00023 issued on June 20, 2003;
- (c) First Administrative Amendment No.: 033-20892-00023 issued on November 7, 2005;
and
- (d) First Significant Permit Modification No.: 033-22121-00023 issued on October 20, 2006.

All conditions from previous approvals were incorporated into this permit except permit conditions that were specifically applicable to Part 70 Operating Permit requirements and the following:

T033-7140-00023 issued on November 22, 2002: Condition D.1.3:

Reason not incorporated: The hazardous air pollutants (HAPs) limitations in permit Condition D.1.3 have been removed because the source is no longer a major source of HAPs. A methyl ethyl ketone (MEK) solvent is used as a clean-up solvent in surface coating booths EU 005a and EU 001. On December 19, 2005, the U.S. EPA removed MEK from the list of hazardous air pollutants. This source is no longer a major source of HAPs because the potential to emit of a single HAP (glycol ether) is less than 10 tons per year and the potential to emit of combined HAPs is less than 25 tons per year. Therefore, the HAP limits in permit Condition D.1.3 are no longer necessary.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

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

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
PM-10	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Dekalb County has been classified as attainment for PM_{2.5}. 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 PM_{2.5} emissions, it has directed states to regulate PM-10 emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Dekalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Dekalb 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 – Entire 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential to Emit (tons/year)
PM	Less than 250
PM-10	Less than 100
SO ₂	Less than 100
VOC	Greater than 100
CO	Less than 100
NO _x	Less than 100

HAPs	Potential to Emit (tons/year)
Toluene	Less than 10
Glycol Ether	Less than 10
Phenol	Less than 10
Formaldehyde	Less than 10
Total HAPs	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOCs is greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data:

Pollutant	Actual Emissions (tons/year)
PM2.5	Not Reported
PM-10	Not Reported
SO ₂	Not Reported
VOC	54.00
CO	Not Reported
NO _x	Not Reported
HAPs	Not Reported

Potential to Emit After Issuance

The source has opted to transition its Part 70 Operating Permit to a FESOP. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)							Total HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	
Surface Coating Operations EU 001 and EU 005a	1.49 ⁽¹⁾	1.49 ⁽¹⁾	-	< 75 ⁽³⁾	-	-	3.12 (Glycol Ether)	4.47
Wheelabrator	0.75 ⁽²⁾	0.75 ⁽²⁾	-	-	-	-	-	-
Combustion Units	0.15	0.62	0.05	0.45	6.82	8.12	0.15 (Hexane)	0.15
Total Emissions	2.40	2.86	0.05	< 100	6.82	8.12	3.12 (Glycol Ether)	4.62
PSD Major Source Thresholds	250	250	250	250	250	250	N/A	N/A

(1) Based on emissions after controls. Particulate (PM) controls are required for surface coating operation EU 001 and EU 005a in order to comply with the requirements of 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes). PM emissions are assumed equal to PM-10 emissions.

(2) Based on emissions after controls. Particulate (PM) controls are required for the wheelabrator in order to comply with the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). PM emissions are assumed equal to PM-10 emissions.

(3) A VOC emission limit is required in order to satisfy the requirements of 326 IAC 2-8-4 (FESOP) and to render 326 IAC 2-7 (Part 70) not applicable.

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

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit involved:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Paint Booth EU 001 -VOC	None	N	69.95	69.95	100	N	N
Paint Booth EU 001-PM	Waterwash	Y	10.27	1.03	100	N	N
Paint Booth EU 001-PM-10	Waterwash	N	10.27	1.03	100	N	N
Paint Booth EU 005a -VOC	None	N	33.52	33.52	100	N	N
Paint Booth EU 005a -PM	Dry filter	Y	4.66	0.47	100	N	N
Paint Booth EU 005a -PM-10	Dry filter	N	4.66	0.47	100	N	N
Wheelabrator - PM	Baghouse	Y	75.09	0.75	100	N	N
Wheelabrator - PM-10	Baghouse	N	75.09	0.75	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the emission units at this source because the potential emissions, before control, of any criteria pollutant from each individual emission unit, are not equal to or greater than Part 70 major source thresholds. Additionally, this source has accepted federally enforceable emission limits to render 326 IAC 2-7 (Part 70) not applicable. Therefore, the requirements of 40 CFR Part 64 (CAM) are not included in the permit.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 or 40 CFR Part 60) included in the permit for this source.
- (c) The requirements of New Source Performance Standards for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) are not applicable to any of the storage vessels at this source. Each storage vessel at this source was constructed prior to June 11, 1973 and has not been modified since constructed. Therefore, the requirements of 40 CFR Part 60, Subpart K are not included in the permit.

- (d) The requirements of New Source Performance Standards for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 (40 CFR Part 60, Subpart Ka) are not applicable to any of the storage vessels at this source. Each storage vessel at this source was constructed prior to May 18, 1978 and has not been modified since constructed. Therefore, the requirements of 40 CFR Part 60, Subpart Ka are not included in the permit.
- (e) The requirements of New Source Performance Standards for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR Part 60, Subpart Kb) are not applicable to any of the storage vessels at this source. Each storage vessel at this source was constructed prior to July 23, 1984 and has not been modified since constructed. Therefore, the requirements of 40 CFR Part 60, Subpart Kb are not included in the permit.
- (f) The two (2) natural gas-fired boilers are not subject the requirements of the New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart D, Subpart Da, Subpart Db, or Subpart Dc) because each boiler has a maximum heat input capacity of less than 10 MMBtu/hr. Therefore, the requirements of 40 CFR Part 60, Subpart D, Da, Db, and Dc are not included in this permit.
- (g) 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 for this source.
- (h) The requirements of National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning (NESHAP) (40 CFR Part 63, Subpart T) are not applicable to any of the solvent cleaners used for surface coating operations (EU 001 and EU 005a) because the source uses methyl ethyl ketone (CAS Number 78-93-3) as a cleaning solvent which is not one of the listed halogenated hazardous air pollutant solvents. Therefore, the requirements of 40 CFR Part 63, Subpart T are not included in the permit.
- (i) The requirements of National Emission Standards for Hazardous Air Pollutants for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (NESHAP) (40 CFR Part 63, Subpart N) are not applicable to any of the electroplating operations because the source performs zinc electroplating and does not perform any hard or decorative chromium electroplating. Therefore, the requirements of 40 CFR Part 63, Subpart N are not included in the permit.

State Rule Applicability - Entire Source

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

This source is not considered a major source under 326 IAC 2-2 (PSD) because it is not one of the 28 listed source categories in 326 IAC 2-2-1(gg), the potential to emit of PM is less than 250 tons per year, the potential to emit of PM-10, CO, NO_x, and SO₂ are each less than 100 tons per year, and emissions of VOC are limited to less than 100 tons per year. Additionally, the source has not had any major modifications under PSD (326 IAC 2-2). Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable to this source.

326 IAC 2-8-4 (FESOP)

Pursuant to 326 IAC 2-8-4 (FESOP), the total combined usage of VOCs in surface coating booths EU 001 and EU 005a, including coatings, dilution solvents, and cleaning solvents shall be less than 75 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the VOC emissions from all other emission units at the source, shall limit the source-wide potential to emit of VOCs to less than 100 tons per year, shall satisfy the requirements of 326 IAC 2-8-4 (FESOP), and render 326 IAC 2-7 (Part 70 Program) not applicable.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 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 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This rule is not applicable because the source began operation in 1968, which is before the rule applicability date of October 7, 1974. Therefore, the requirements of this rule have not been included in the permit.

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

Pursuant to 326 IAC 2-4.1-1, any new process or production unit, which in and of itself emits or has the potential to emit (PTE) equal to or greater than 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The source-wide potential to emit of each single HAP is less than 10 tons per year and the source-wide potential to emit of combined HAPs is less than 25 tons per year. Therefore, pursuant to 326 IAC 2-4.1(b)(2) the requirements of 326 IAC 2-4.1 do not apply.

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, identified as EU 001 and EU 005a, shall be controlled by a dry particulate filter, waterwash, or equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Pursuant to 326 IAC 6-3-2(e), particulate from the one (1) wheelabrator shall not exceed 3.59 pounds per hour based on a process weight rate of 1,643 pounds per hour and the following:

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

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

In this case $P = 0.8215$ tons per hour, therefore:

$$E = 4.10 (0.8215)^{0.67} = 3.59 \text{ pounds of PM per hour}$$

The uncontrolled PM emission rate for the wheelabrator is 17.14 pounds per hour, which is greater than the allowable particulate emission rate calculated above (3.59 pounds per hour). The controlled PM emission rate for the wheelabrator is 0.17 pounds per hour, which is less than the allowable particulate emission rate calculated above. Therefore, the wheelabrator is able to comply with 326 IAC 6-3-2 by using a baghouse for PM control at all times that the wheelabrator is in use.

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

Pursuant to 326 IAC 6-2-3(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have a heat input capacity of 10 MMBtu/hr or less and which began operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

$$Pt = \frac{50 \times 0.67 \times 25}{76.5 \times 10^{0.75} \times 2^{0.25}} = 1.64 \text{ lb/MMBtu}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter (μ/m^3) for a period not to exceed a sixty (60) minute time period.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet. The stack heights for the associated boilers are 25 feet each. Therefore, the average stack height is 25.

The allowable particulate emission rate from each boiler, based on the above equation, is 1.64 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-3(d), the allowable particulate emission rate for any facility which has 250 MMBtu per hour heat input or less and which began operation before June 8, 1972, shall not exceed 0.8 pounds per MMBtu heat input. Therefore, the allowable particulate emission rate for each of the two (2) boilers is 0.8 pounds of PM per MMBtu heat input each.

Boilers Compliance Determination using Natural Gas:
 $(1.9 \text{ lbs/MMscf}) * (1/1,000 \text{ scf/btu}) = 0.0019 \text{ lbs PM per MMBtu}$

The source is able to comply with the PM limit for the boilers.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The two (2) natural gas-fired boilers, each with a heat input capacity of 5.0 MMBtu/hr, are not subject to the requirements of 326 IAC 7-1.1-1 because the potential emissions of sulfur dioxide (SO₂) from each boiler are less than 25 tons per year. Therefore, the requirements of this rule are not included in this permit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-1(a)(1), the requirements of 326 IAC 8-2-9 apply to facilities constructed as of November 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph Counties, and which have potential emissions of 100 tons or greater per year of VOC. Pursuant to 326 IAC 8-2-1(a)(3), the requirements of 326 IAC 8-2-9 also apply to facilities constructed as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter, and St. Joseph Counties and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 326 IAC 8-2-1(a)(2), the requirements of 326 IAC 8-2-9 apply to facilities as described below which were constructed after November 1, 1980, located in any county, and which have potential emissions of 25 tons or greater per year of VOC. Pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9 also apply to facilities as described below which were constructed after July 1, 1990, located in any county, and which have actual emissions of greater than 15 pounds of VOC per day before add-on controls.

The requirements of 326 IAC 8-2-9 apply to the surface coating of the following:

- (1) Large and small farm machinery.
- (2) Small household appliances.
- (3) Office equipment.
- (4) Industrial machinery.
- (5) Any other industrial category which coats metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, and #39.

Spray Coating Booth (EU 001)

The spray coating booth, identified as EU 001 which coats metal parts, has a potential to emit of VOCs less than 100 tons per year but has a potential to emit of VOCs greater than 15 pounds per day. This facility was constructed prior to November 1, 1980. However, the source is located in Dekalb County, which is not one of the specifically listed counties under 326 IAC 8-2-1(a)(1) or 326 IAC 8-2-1(a)(3). Therefore, the requirements of 326 IAC 8-2-9 do not apply to the spray coating booth EU 001.

Spray Coating Booth (EU 005a)

The requirements of 329 IAC 8-2-9 are applicable to the spray coating booth, identified as EU 005a, which was constructed in 2003, because the source has a SIC code of 3499, which is one of the specified SIC codes in this rule, and the actual emissions of VOCs from EU 005a which coats metal parts are greater than the 15 pounds per day applicability threshold. The potential to emit of VOCs, including VOCs from coating usage and solvent cleaning usage, for this facility is also greater than 25 tons per year. Therefore the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are included in the permit as follows:

The volatile organic compound (VOC) content of the coating delivered to the applicator of spray booth EU 005a shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, spray coating operation EU 005a is able to comply with this requirement.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

The requirements of 326 IAC 8-1-6 are applicable to new facilities constructed on or after January 1, 1980 and which have the potential to emit of 25 tons per year or more of VOCs and are not regulated by another Article 8 rule (326 IAC 8). Spray coating booth EU 005a was constructed after the January 1, 1980 rule applicability date and has a potential to emit of greater than 25 tons per year of VOCs. However, surface coating booth EU 005a is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating). Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply to this facility (EU 005a). Spray coating booth EU 001 has a potential to emit of VOCs greater than 25 tons per year. However the spray booth (EU 001) was constructed before the January 1, 1980 rule applicability date. Therefore, the requirements of 326 8-1-6 (BACT) do not apply to this facility (EU 001). There are no other facilities at this source that have a potential to emit of VOCs greater than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not included in the permit.

326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaning Operation)

The requirements of 326 IAC 8-3-2 are not applicable to any of the parts washers because each parts washer was constructed prior to January 1, 1980 and the source is located in Dekalb County, which is not one of the specifically listed counties in 326 IAC 8-3-2(a)(1). Therefore, the requirements of 326 IAC 8-3-2 are not included in the permit.

326 IAC 8-4-1 (Petroleum Sources)

The requirements of 326 IAC 8-4-1 do not apply to the one gasoline storage tank because it was installed prior to January 1, 1980, it is located in Dekalb County, and has maximum monthly throughputs of less than 10,000 gallons. There are no other petroleum storage tanks at this plant. Therefore, the requirements of 326 IAC 8-4-1 are not included in the permit.

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

Compliance Determination and Monitoring Requirements

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

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

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

- (a) The surface coating booth EU 005a has applicable compliance determination conditions as specified below:
 - (1) Dry Filters: Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (Stack No. 5) while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for surface coating booth EU 005a must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

- (b) The surface coating booth EU 001 has applicable compliance determination conditions as specified below:
 - (1) Waterwash Scrubbing System: Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Screens in the wash water scrubbing system shall be maintained to prevent a reduction in the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify the condition of the baffles meet the recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stack (Stack No. 1) while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the waterwash for surface coating booth EU 001 must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Recommendation

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

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

An application for the purposes of this review was received on February 16, 2007.

Conclusion

The operation of this steel and plastic drum closure products manufacturing plant shall be subject to the conditions of the attached FESOP No.: F033-24328-00023.

Appendix A: Emission Calculations

Company Name: Rieke Packaging Systems
Address: 500 West 7th Street, Auburn, Indiana 46706
Permit Number: F033-24328-00023
Reviewer: Tanya White/EVP
Date: 09/07/07

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating Operations	Natural Gas Combustion	Wheelabrator	Total
PM	14.93	0.15	75.09	90.17
PM-10	14.93	0.62	75.09	90.63
SO ₂	0.00	0.05	0.00	0.05
NO _x	0.00	8.12	0.00	8.12
VOC	103.47	0.45	0.00	103.92
CO	0.00	6.82	0.00	6.82
total HAPs	4.47	0.15	0.00	4.62
worst case single HAP	3.12	0.15	0.00	3.12
	Glycol Ether	Hexane		Glycol Ether
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating Operations	Natural Gas Combustion	Wheelabrator	Total
PM	1.49	0.15	0.75	2.40
PM-10	1.49	0.62	0.75	2.86
SO ₂	0.00	0.05	0.00	0.05
NO _x	0.00	8.12	0.00	8.12
VOC	< 75	0.45	0.00	< 100
CO	0.00	6.82	0.00	6.82
total HAPs	4.47	0.15	0.00	4.62
worst case single HAP	3.12	0.15	0.00	3.12
	Glycol Ether	Hexane		Glycol Ether
Total emissions based on rated capacity at 8,760 hours/year, after controls.				

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MMBtu/hr <100
 Cure Oven, Sludge Dryer, Heater Make-Up Air Unit,
 Bake Oven, and Boilers**

Company Name: Rieke Packaging Systems
Address: 500 West 7th Street, Auburn, Indiana 46706
Permit Number: F033-24328-00023
Reviewer: Tanya White/EVP
Date: 09/07/07

Heat Input Capacity
 MMBtu/hr

18.55

Potential Throughput
 MMCF/yr

162.50

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM-10*	SO ₂	NOx 100.0 **see below	VOC	CO
Potential Emission in tons/yr	0.15	0.62	0.05	8.12	0.45	6.82

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 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)

Emissions (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
Cure Oven, Sludge Dryer, Heater Make-Up Air Unit,
Bake Oven, and Boilers
HAP Emissions

Company Name: Rieke Packaging Systems
Address: 500 West 7th Street, Auburn, Indiana 46706
Permit Number: F033-24328-00023
Reviewer: Tanya White/EVP
Date: 09/07/07

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 Emissions in tons/yr	1.706E-04	9.750E-05	6.094E-03	1.462E-01	2.762E-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 Emissions in tons/yr	4.062E-05	8.937E-05	1.137E-04	3.087E-05	1.706E-04

Methodology is the same as previous page.

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

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

Company Name: Rieke Packaging Systems
Address: 500 West 7th Street, Auburn, Indiana 46706
Permit Number: F033-24328-00023
Reviewer: Tanya White/EVP
Date: 09/07/07

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gallons of Material (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
Spray Booth EU 005a																
Resco LT Brown	9.67	43.60%	14.10%	29.50%	16.40%	43.90%	0.00013	3000.00	3.41	2.85	1.11	26.70	4.87	4.66	6.50	50%
Resco Red	9.50	59.50%	40.50%	19.00%	46.20%	30.50%	0.00013	3000.00	3.36	1.81	0.70	16.89	3.08	3.29	5.92	50%
Resco Olive Green	9.80	45.40%	17.90%	27.50%	21.00%	42.00%	0.00013	3000.00	3.41	2.70	1.05	25.23	4.60	4.57	6.42	50%
Spray Booth EU 001																
EDH-002	4.55	61.00%	0.00%	61.00%	0.00%	39.00%	0.000139	6200.00	2.78	2.78	2.39	57.29	10.45	3.34	7.12	50%
Resco LT Brown	9.67	43.60%	14.10%	29.50%	16.40%	43.90%	0.000139	6200.00	3.41	2.85	2.45	58.88	10.75	10.27	6.50	50%
Resco Red	9.50	59.50%	40.50%	19.00%	46.20%	30.50%	0.000139	6200.00	3.36	1.81	1.55	37.26	6.80	7.25	5.92	50%
Resco Olive Green	9.80	45.40%	17.90%	27.50%	21.00%	42.00%	0.000139	6200.00	3.41	2.70	2.32	55.62	10.15	10.08	6.42	50%
Clean-up Solvent for Spray Booths EU 001 and EU 005a																
MEK Solvent Reducer	6.75	100.00%	0.00%	100.00%	0.00%	0.00%	0.000323	9200.00	6.75	6.75	20.06	481.40	87.86	0.00	N/A	50%

Potential Emissions (tons/yr) = **23.62**
Potential Emissions (after control) for spray booth EU 005a (tons/yr)* = **566.98**
Potential Emissions (after control) for spray booth EU 001 (tons/yr) =** **103.47**
14.93
0.47
1.03

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) x Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) x Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) x Gallons of Material (gal/unit) x Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) x Gallons of Material (gal/unit) x Maximum (units/hr) x (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) x Gallons of Material (gal/unit) x Maximum (units/hr) x (8760 hr/yr) x (1 ton/2000 lbs)
Particulate Potential Tons per Year = Maximum (units/hour) x Gallons of Material (gal/unit) x Density (lbs/gal) x (1- Weight % Volatiles) x (1-Transfer efficiency) x (8760 hrs/yr) x (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) x Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
* Assumed a particulate control efficiency of 90% for the dry filters for spray booth EU 005a.
** Assumed a particulate control efficiency of 90% for the waterwash for spray booth EU 001.
Please note that the coating materials within each booth are mutually exclusive.

Appendix A: Emissions Calculations

HAP Emissions

From Surface Coating Operations

Company Name: Rieke Packaging Systems
Address: 500 West 7th Street, Auburn, Indiana 46706
Permit Number: F033-24328-00023
Reviewer: Tanya White/EVP
Date: 09/07/07

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Phenol	Weight % Formaldehyde	Weight % Glycol Ethers	Weight % Toluene	Phenol Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Toluene Emissions (ton/yr)
Spray Booth EU 005a											
Resco LT Brown	9.67	0.00013	3000.00	2.90%	1.10%	0.00%	0.00%	0.48	0.18	0.00	0.00
Resco Red	9.50	0.00013	3000.00	0.00%	0.00%	9.60%	0.00%	0.00	0.00	1.56	0.00
Resco Olive Green	9.80	0.00013	3000.00	2.93%	1.10%	0.00%	0.00%	0.49	0.18	0.00	0.00
Spray Booth EU 001											
EDH-002	4.55	0.000139	6200.00	0.00%	0.10%	5.00%	10.00%	0.00	0.02	0.86	1.71
Resco LT Brown	9.67	0.00013	3000.00	2.90%	1.10%	0.00%	0.00%	0.48	0.18	0.00	0.00
Resco Red	9.50	0.00013	3000.00	0.00%	0.00%	9.60%	0.00%	0.00	0.00	1.56	0.00
Resco Olive Green	9.80	0.00013	3000.00	2.93%	1.10%	0.00%	0.00%	0.49	0.18	0.00	0.00
Clean-up Solvent for Spray Booths EU 001 and EU 005a											
MEK Solvent Reducer	6.75	0.000323	9200.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Potential Emissions (tons/yr) =								0.98	0.37	3.12	1.71

METHODOLOGY

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

Please note that the coating materials within each booth are mutually exclusive.

**Appendix A: Emissions Calculations
Particulate Emissions
From One (1) Wheelabrator**

Company Name: Rieke Packaging Systems
Address: 500 West 7th Street, Auburn, Indiana 46706
Permit Number: F033-24328-00023
Reviewer: Tanya White/EVP
Date: 09/07/07

Emission Unit Description	Outlet Grain Loading (gr/acf)	Control Device Fan Flow Rate (acfm)	PM/PM-10 Control Efficiency (%)	Potential PM/PM-10 Emission Rate			
				Before Controls (lb/hr)	Before Controls (tons/yr)	After Controls (lb/hr)	After Controls (tons/yr)
Wheelabrator	0.005	4000.00	99.00%	17.14	75.09	0.17	0.75

Methodology:

Potential Uncontrolled Emissions (tons/yr) = Outlet Loading (grains/acf) x Fan Flow Rate (acfm) x 1 lb/7,000 grains x 60 min/hr x 8760 hr/yr x 1 ton/2,000 lbs

Potential Controlled Emissions (tons/yr) = Outlet Loading (grains/acf) x Fan Flow Rate (acfm) x 1 lb/7,000 grains x 60 min/hr x 8760 hr/yr x 1 ton/2,000 lbs x (1 - Control Efficiency)

Total PM is assumed equal to PM-10.