INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Dan Borgenheimer,
Plant Engineering Manager
3M Hartford City
304 South, 075 East
Hartford City, Indiana 47348

Re: 009-24417-00004
Third Significant Permit Modification to
Part 70 No.: T 009-7712-00004

Dear Mr. Dan Borgenheimer:

3M Hartford City was issued a part 70 operating permit on December 9, 2003 for a tape, label and extruded web manufacturing plant. A letter requesting changes to this permit was received on March 6, 2007. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the thermal oxidizers compliance monitoring conditions, and the construction and operation of two (2) new 800 BTU/hr ovens and an additional coating module and enclosure on an existing web coating line VCS Coater (EU004). All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Bryan Lange, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7854 to speak directly to Mr. Lange. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/BL

cc: File - Blackford County
U.S. EPA, Region V
Blackford County Health Department
IDEM, Northern Regional Office
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner
Billing, Licensing and Training Section - Dan Stamatkin

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

3M
304S 075E
Hartford City, Indiana 47348

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T009-7712-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 9, 2003 Expiration Date: December 9, 2008

First Significant Permit Modification No.: 009-20292-00004, issued on March 2, 2006.
Second Significant Permit Modification No.: 009-20900-00004, issued on (pending)

Third Significant Permit Modification No.: 009-24417-00004	Affected Pages:
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: December 9, 2008

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a tapes, labels and extruded web manufacturing plant.

Source Address:	304S 075E, Hartford City, Indiana 47348
Mailing Address:	304S 075E, Hartford City, Indiana 47348
SIC Codes:	2672, 3081
County Location:	Blackford
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Major Source, Section 112 of the Clean Air Act

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

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

(a) One (1) BA Coating Line, identified as EU001, constructed in 1963, consisting of the following equipment:

Two (2) coating stations (coating stations 1 and 2), installed in 1963, and one (1) coating station (coating station 3), installed in 1995, each applying coatings with methods including, but not limited to, gravure, reverse roll, extrusion die, hopper/knife, and/or slot die, utilizing thermal oxidizer No. 2, identified as C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;

(b) One (1) BC-1 Coating Line, identified as EU002, constructed in 1963 and 1986, consisting of the following equipment:

One (1) coating station, installed in 1963, and one (1) coating station installed in 1986, each applying coatings with methods including, but not limited to, pressure fed die, gravure, curtain and/or fluid bed, utilizing thermal oxidizer No. 1, identified as C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(c) One (1) BC-2 Coating Line, identified as EU003, consisting of the following equipment:

One (1) coating station, installed in 1963, applying coatings with methods including, but not limited to, wrap cast, reverse roll, gravure, and/or reverse gravure, utilizing thermal oxidizer No. 1, identified as C001, for volatile organic compound (VOC) control, exhausting to stack S/V888-001. This Coating Line was changed as per a permit issued on July 10, 1998;

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994, consisting of the following equipment: Under 40 CFR 60, Subpart RR, this facility is considered an existing pressure sensitive tape and label materials coating line.

(1) One (1) compounding room, constructed in 1994, exhausting to stack S/V 001-001;

(2) One (1) coating station, installed in 1994, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(3) One (1) coating station, approved for construction in 2007, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing an enclosure and a thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001; and

(4) Two (2) natural gas-fired drying ovens, approved for construction in 2007, with a rated capacity of 800 BTU/hr each.

(e) One (1) Extrusion Line, identified as EU005, constructed in 1996, consisting of one (1) extruder, calendar rolls, and one (1) oven, utilizing thermal oxidizer No. 2, C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;

(f) One (1) compounding/mix & mill area, identified as EU007, containing variety of mixing vessels, each constructed between 1957-1995, used for mixing in the compounding area;

(g) Three (3) boilers, identified as EU008, EU009, and EU010, each constructed in 1986, each with a maximum heat input capacity of 12.553 MMBtu per hour, each combusting natural gas and No.2 Fuel Oil, exhausting to stacks S/V 001-005, 001-006, and 001-007, respectively;

(h) Six (6) outdoor bulk storage tanks, identified as T001, T003, T006, T008, T009 and T012, each constructed in 1988, 1976, 1986, 1999, 1985 and 2000, respectively, each with a maximum tank capacity of 30,000, 20,000, 30,000, 275, 275 and 275 gallons, respectively, each containing volatile organic liquids with maximum true vapor pressure less than 15.0 kPa; and

(i) Four (4) indoor bulk storage tanks, identified as T002, T004, T005, and T007, each constructed in 1997, 1997, 1997, and 1992, respectively, each with a maximum tank capacity of 300, 300, 300 and 7500 gallons, respectively, each containing volatile organic liquids with maximum true vapor pressure less than 15.0 kPa, and a fifth indoor tank, To11, constructed in 1991, with a maximum tank capacity of 1500 gallons, inactive at the time of issuance of the permit but with the potential for holding volatile organic liquids with maximum true vapor pressure less than 15.0 k Pa.

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

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2].

(b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(e)];

(c) Trimmers that do not produce fugitive emissions that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2(e)];

(d) Paved and unpaved roads and parking lots with public access [326 IAC 6-4-3].

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T009-7712-00004, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 in letter form no later than July 1 of each year to:

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

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determination regarding this source:

(1) BA Coating Line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR) because of the following reasons:

(i) The BA Coating Line was originally constructed in 1963 (prior to the applicability date of December 30, 1980);

(ii) The changes to the BA Coating Line do not constitute a reconstruction because the fixed cost of the new equipment does not exceed 50% of the fixed capital cost required to construct an entirely new facility; and

(iii) The changes to the BA Coating Line do not constitute a modification. The NSPS modification provisions of 40 CFR 60.14 apply when a physical or operational change occurs which could result in an increase in the hourly potential emissions, unless such change qualifies for one of the exemptions at 40 CFR 60.14(e). The emission rate before and after a physical or operational change is evaluated by comparing the hourly potential emissions under maximum capacity immediately before the change to emissions at maximum capacity after the change. Under the General Provisions of the NSPS, only physical limitations on maximum capacity are considered in determining potential emissions. 3M has provided with adequate evidence to IDEM that there was a decrease in the hourly potential emissions based on the maximum capacity, as a result of the 1995 changes made to the BA Coater. The changes made to the BA Coater in 1995 decreased the maximum exhaust flow rate thereby decreasing the potential emissions from 2,332 lbs/hr to 752 lbs/hr.

(2) BC-1 Coating Line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR), because none of the equipment for this coating line was constructed, reconstructed, or modified after the December 30, 1980 rule applicability date.

(3) BC-2 Coating Line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR) because pursuant to CP-009-9364-00004, issued on July 10, 1998:

(i) The BC-2 Coating Line was originally constructed in 1963 (prior to the applicability date of December 30, 1980);

(ii) The changes to the BC-2 Coating Line do not constitute a reconstruction because the fixed cost of the new equipment does not exceed 50% of the fixed capital cost required to construct an entirely new facility; and

(iii) The changes to the BC-2 Coating Line do not constitute a modification. The NSPS modification provisions of 40 CFR 60.14 apply when a physical or operational change occurs which could result in an increase in the hourly potential emissions, unless such change qualifies for one of the exemptions at 40 CFR 60.14(e). The emission rate before and after a physical or operational change is evaluated by comparing the hourly

potential emissions under maximum capacity immediately before the change to emissions at maximum capacity after the change. Under the General Provisions of the NSPS, only physical limitations on maximum capacity are considered in determining potential emissions. There was no change to the maximum capacity or hourly potential emissions based on the maximum capacity, as a result of the 1998 changes made to the BC-2 Coater.

(4) The three (3) boilers (EU008, EU009, EU010), all constructed in 1986, are not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

(5) The storage tanks T001 and T006 are not subject to New source Performance Standard, 326 IAC 12 (40 CFR 60.110 and 110a, Subparts K and Ka) because the tanks were constructed in 1988 and 1986, respectively, and the storage capacity of each tank is less than 40,000 gallons.

(6) Storage tanks T003 is not subject to New source Performance Standard, 326 IAC 12 (40 CFR 60.110, 110a, and 110b, Subparts K, Ka and Kb) because it was constructed in 1976, prior to the rule applicability date of July 23, 1984 for Kb, and because the storage capacity of the tank is less than 40,000 gallons for K and Ka.

(7) Storage tanks T008, T009, and T012 are not subject to New source Performance Standard, 326 IAC 12 (40 CFR 60.110, 110a, and 110b, Subparts K, Ka and Kb) because the tanks were constructed in 1999, 1985 and 2000, respectively, and the storage tank capacity of each tank is less than 40 cubic meters for Kb.

(8) Storage tanks T002, T004, T005, T007 and T011 are not subject to New source Performance Standard, 326 IAC 12 (40 CFR 60.110, 110a, and 110b, Subparts K, Ka and Kb) because the tanks were constructed in 1997, 1997, 1997, 1992 and 1991, respectively, and the storage capacity of each tank is less than 40 cubic meters for Kb.

(9) This source is not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ) because the affected facility to which the provisions of this subpart apply is for publication rotogravure printing press. This source does not use publication rotogravure printing press.

(10) The degreasers are not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63.460, Subpart T. The degreasers do not use any halogenated solvent cleaners.

(11) This source is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63.701, Subpart EE. This source does not have any magnetic tape manufacturing operations.

(12) This source is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63.820, Subpart KK. This source does not use publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.

(13) This source is not subject to 326 IAC 2-2 (Prevention of Significant Deterioration). The source was initially constructed in 1957, prior to the August 7, 1977 (326 IAC 2-2, Prevention of Significant Deterioration) rule applicability date. Potential volatile organic compound (VOC) emissions from the source were greater than 250 tons per year on August 7, 1977 and is considered a PSD major source. The

source had several modifications after the August 7, 1977 rule applicability date, none of which is a major modification pursuant this rule for the following reasons:

(A) The three (3) No. 2 Fuel Oil fired boilers, each constructed in 1986, did not trigger PSD applicability. The potential NOx emissions from each of the three (3) boilers were calculated to be 7.9 tpy, or 23.7 tpy (combined), when burning No. 2 Fuel Oil, based on the maximum boiler capacity and US EPA AP- 42 emissions factors, which is less than the PSD major modification significant emission rate threshold for NOx (as NO_2) of 40 tpy. The sulfur content of the No. 2 fuel oil used for the three (3) boilers shall be limited such that combined sulfur dioxide emissions from the three (3) boilers do not exceed 40 tons (PSD major modification significant emission rate threshold for SO_2) per year. Therefore, the construction of the three boilers was not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

(B) Pursuant to CP-009-3127-00004, issued on March 7, 1994, the VCS Coating Line did not trigger PSD applicability. The controlled potential to emit VOC from this facility is equal to 9.20 tpy, after enforceable controls utilizing a thermal oxidizer for VOC emission control. This is less than PSD major modification significant emission rate threshold for VOC of 40 tpy. Therefore, the installation of VCS coating line was not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

(C) Pursuant to CP-009-3871-00004, issued on July 14, 1995, the modification of the BA Coating Line did not trigger PSD applicability. This modification was not a major modification pursuant to 326 IAC 2-2 because the source agreed to limit future actual VOC emissions from the BA Coating Line to no more than 39 tpy above the baseline actual emissions for the existing line. Pursuant to 40 CFR 52.21(B)(21) and 326 IAC 2-2-1(b), actual emissions are generally defined in terms of the two (2) year period preceding a modification when such time-frame represents normal operations. However, the same definition provides for the use of a different 2-year period if such is more representative of normal source operations. During the permit review process for CP009-3871, 3M provided information to IDEM to show that the BA Coater did not have actual emissions reflective of normal operations during any 2-year period after 1989, and that the proposed modification would result in more normal, pre-1989, operations. As such, IDEM, OAQ, agreed that the 2-year period, 1989-1990, would represent normal operations and the related average actual emission rate was determined as 967 tons VOC per year. For the BA Coating Line modification, the total VOC emission rate was limited to 967 tpy, plus 39 tpy, or 1,006 tpy. Therefore, the modification of the BA Coating Line was not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). This emission limit notwithstanding, the source also decided to use a thermal oxidizer on the BA Coating line with a VOC control efficiency (capture/destruction) of 75% after the modification. Therefore, the PTE for the BA Coating Line modification, after the installation of thermal oxidizer and in conjunction with VOC usage limit of 1006 tpy, was 252 tpy.

(D) Pursuant to CP-009-5747-00004, issued on June 4, 1996, the Extrusion Line did not trigger PSD applicability. The controlled potential to emit VOC from this facility is equal to 14 tpy, after enforceable controls utilizing a thermal oxidizer for VOC emission control. This is less than PSD major modification significant emission rate threshold for VOC of 40 tpy. Therefore, the installation of Extrusion Line was not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

(E) Pursuant to CP-009-9364-00004, issued on July 10, 1998, the modification of the BC-2 Coating Line did not trigger PSD applicability.

This modification was not a major modification pursuant to 326 IAC 2-2 because this source agreed to limit future VOC emissions from the BC-2 Coating Line to no more than 39 tpy above the baseline actual emissions for the line. Pursuant to 40 CFR 52.21(B)(21) and 326 IAC 2-2-1(b), actual emissions are generally defined in terms of the two (2) year period preceding a modification when such time-frame represents normal operations. However, the same definition provides for the use of a different 2-year period if such is more representative of normal source operations. During the permit review process for CP009-9364, 3M provided information to IDEM to show that the BC-2 Coater did not have actual emissions reflective of normal operations during any 2-year period after 1993, and that the proposed modification would result in more normal, pre-1993, operations. As such, IDEM, OAQ, agreed that the 2-year period, 1992-1993, would represent normal operations and the related average actual emission rate was determined as 446 tons VOC per year. For the BC-2 Coating Line modification, the total VOC emission rate was limited to 446 tpy, plus 39 tpy, or 485 tpy.

Therefore, the modification of the BC-2 Coating Line was not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

(14) This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

All the emission units and pollution control equipment for this source were constructed before the July 27, 1997 rule applicability date. Therefore the requirements of this rule do not apply to this source.

(15) The oven zones from the BA, BC-1, BC-2, VCS Coating Lines and the heaters from the Extrusion Line are not subject to 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating). The oven zones from the BA, BC-1, BC-2, VCS Coating Line and the heaters from the Extrusion Line are not indirect heating facilities.

(16) The BC-1 and BC-2 Coating Lines are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements). This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). The two (2) Coating Lines were constructed before 1980, therefore, the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) do not apply.

(17) The VCS Coating Line is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because it is subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations).

(18) The BC-1 and BC-2 Coating Lines are not subject to 326 IAC 8-2-5 (Paper Coating Operations). The two (2) Coating Lines are located in Blackford County and were constructed prior to the applicability date of January 1, 1980, specified in 326 IAC 8-2-1(a)(2).

(19) This source is not subject to 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). This rule applies to all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (thirty-nine thousand (39,000)

gallons) containing volatile organic compounds whose true vapor pressure is greater than 10.5 kPa (1.52 psi). Tanks (T001-T011) are not subject to 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) because these petroleum liquid storage vessels have capacities less than 39,000 gallons.

(20) This source is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations) This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities 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. All the facilities for this source, located in Blackford County were either constructed before October 7, 1974 or after January 1, 1980. Therefore, this rule does not apply to this source.

(21) This source is not subject to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties). The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Blackford County. Therefore, this rule is not applicable to this source.

(22) This source is not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels). On and after October 1, 1995, this rule applies to stationary vessels used to store volatile organic liquid (VOL) that are located in Clark, Floyd, Lake, or Porter County. Tanks (T001-T011) are not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels), because these tanks are located in Blackford County.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T009-7712-00004 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

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

Indianapolis, Indiana 46204-2251

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

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

B.18 Permit Revision under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;
(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5] *[326 IAC 2-2-2]*

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.24 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any

applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 the “responsible official” as defined by 326 IAC 2-7-1(34).

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5] [326 IAC 2-7-6]

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

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

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

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

(c) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [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 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;
(2) monitor performance data, if applicable; and
(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2008 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

(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) If there is a "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, other than projects at a source with a Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) Prior to commencing the construction of the "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
  - (i) Baseline actual emissions;

(ii) Projected actual emissions;
(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) 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.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C-General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) BA Coating Line, identified as EU001, constructed in 1963, consisting of the following equipment:

Two (2) coating stations (coating stations 1 and 2), installed in 1963, and one (1) coating station (coating station 3), installed in 1995, each applying coatings with methods including, but not limited to, gravure, reverse roll, extrusion die, hopper/knife, and/or slot die, utilizing thermal oxidizer No. 2, identified as C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;

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

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

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

(a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the owner or operator shall not allow the discharge into the atmosphere VOC in excess of 2.9 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.

Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the BA Coating Line shall be limited to no greater than the equivalent emissions, expressed as 4.79 pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than 66.5%, based on the worst case coating VOC content of 4.86 lbs / gallon coating less water, and calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

(b) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC usage at the BA Coating Line shall be limited to 5,040 tons per year, and the thermal oxidizer shall achieve a minimum overall control efficiency of 95% for VOC emission control. This limit limits the potential to emit VOC to 252 tons per year.

(c) A fifteen (15) minute period per calendar month shall be allowed to exercise the purge stack dampers provided that a monthly summary including time and date of each exercising period is recorded and submitted to the OAQ upon request.

(d) Compliance with this Condition shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

Compliance Determination Requirements

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

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with condition D.1.1.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after the issuance of the permit, the Permittee shall conduct a performance test to verify VOC control efficiency as per condition D.1.1 (a) and (c) for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.5 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1441 ^{0}F. A 3-hour average temperature that is below 1441 ^{0}F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1(a) and (c), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission and usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a 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 calculated weight of the VOC per volume of coating solids, for each coating (lb VOC / gal solids).

(4) The monthly cleanup solvent usage.

(5) The total VOC usage for each month.

(6) The weight of VOC emitted for each compliance period.

(b) To document compliance with condition D.1.5, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

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

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(b) 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 the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(b) One (1) BC-1 Coating Line, identified as EU002, constructed in 1963 and 1986, consisting of the following equipment:

One (1) coating station, installed in 1963, and one (1) coating station installed in 1986, each applying coatings with methods including, but not limited to, pressure fed die, gravure, curtain and/or fluid bed, utilizing thermal oxidizer No. 1, identified as C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(c) One (1) BC-2 Coating Line, identified as EU003, consisting of the following equipment:

One (1) coating station, installed in 1963, applying coatings with methods including, but not limited to, wrap cast, reverse roll, gravure, and/or reverse gravure, utilizing thermal oxidizer No. 1, identified as C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001. This Coating Line was changed as per a permit issued on July 10, 1998;

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to CP-009-9364-00004, issued on July 10, 1998, the following is a summary of the BC-2 Coating Line VOC emission limitation:

(a) The VOC input to the BC-2 Coating Line when operating without controls added to the VOC input to the BC-2 coater when the capture system and thermal oxidizer are in operation shall be limited such that the potential to emit (PTE) VOCs based on the following equations does not exceed 485 tons per twelve (12) consecutive month period with compliance determined at the end of each month:

$E_{VOC} = (u_u * W_{u,avg}) + (u_c * W_{c,avg} * (1-c_{eff}))$ (i)

$PTE_{VOC} = (E_{VOC,this\ month} + E_{VOC,\ last\ 11\text{-}months})$ (ii)

where: E_{VOC} = the monthly emissions of VOCs in tons per month

u_u = The total amount of uncontrolled coatings used in tons per month (when the capture system or thermal oxidizer is not operating)

$w_{u,avg}$ = the monthly weighted average weight percent (%) VOC of uncontrolled coatings used

u_c = the total amount of controlled coatings used in tons per month (when both the capture system and thermal oxidizer are operating

$w_{c,avg}$ = the monthly usage weighted average weight percent (%) VOC of controlled coatings used

c_{eff} = the overall control efficiency of the control system

PTE_{VOC} = the potential to emit VOCs in tons per twelve (12) consecutive month period

(b) Compliance with this VOC input limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer for the BC-2 Coating Line as required to achieve compliance with condition D.2.1.

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after the issuance of the permit, the Permittee shall conduct a performance test to verify VOC control efficiency is always maintained at or above 78.8% as per condition D.2.1(a) for the thermal oxidizer for the BC-2 Coating Line, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.2.5 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1410 ^{0}F. A 3-hour average temperature that is below 1410 ^{0}F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1(a) (BC-2 Coating Line), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.6 Record Keeping Requirements

(a) To document compliance with condition D.2.1(a), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission and usage limits established in condition D.2.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a 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 calculated weight of the VOC per volume of coating solids, for each coating (lb VOC / gal solids).

(4) The monthly cleanup solvent usage.

(5) The total VOC usage for each month.

(6) The weight of VOC emitted for each compliance period.

(b) To document compliance with condition D.2.5, the Permittee shall maintain continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

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

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 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 the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994, consisting of the following equipment: Under 40 CFR 60, Subpart RR, this facility is considered an existing pressure sensitive tape and label materials coating line.

(1) One (1) compounding room, constructed in 1994, exhausting to stack S/V 001-001;

(2) One (1) coating station, installed in 1994, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(3) One (1) coating station, approved for construction in 2007, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing an enclosure and a thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(4) Two (2) natural gas-fired drying ovens, approved for construction in 2007, with a rated capacity of 800 BTU/hr each.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5][326 IAC 2-2][326 IAC 12] [40 CFR 60.442]

(a) Pursuant to 40 CFR 60.442, Subpart RR, the VCS Coating Line:

(1) Shall use a thermal oxidizer (minimum of 90 % overall destruction efficiency), whenever the solvent-based coating solution is used, or

(2) Shall discharge no greater than 0.2 kg VOC/kg of coating solids applied, whenever the water based coating solution is used.

(b) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the owner or operator shall not allow the discharge into the atmosphere VOC in excess of 2.9 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.

Based on the information presented in CP-009-3127-00004, issued on March 7, 1994, the water based coating solutions for the VCS Coating Line contain negligible volatile organic compounds (VOC) and have VOC content of less than 2.9 pounds per gallon of coating.

Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the VCS Coating Line when using solvent based coatings shall be limited to no greater than the equivalent emissions, expressed as 4.79 pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC

E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than 66.5%, based on the worst case coating VOC content of 4.86 lbs / gallon coating less water, and calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

(c) The thermal oxidizer shall be operated at all times to achieve the limit pursuant to 326 IAC 8-2-5 of 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water and the thermal oxidizer shall maintain a minimum 90% overall control efficiency pursuant to 326 IAC 12 and 40 CFR 60.442.

(d) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC usage including clean-up solvents at the VCS Coating Line (EU004) shall be limited to 184 tons per year, and the thermal oxidizer shall achieve a minimum overall control efficiency of 95% for VOC emission control. Compliance with this limitation shall limit this modification to less than the PSD major modification VOC significant emission rate threshold of 40 tpy. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer at all times when the VCS Coating Line is operating and not coating with water-based coating solutions, to achieve compliance with conditions D.3.-1(a) and (d).

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after the initial startup of the coating station, the Permittee shall conduct a performance test to verify VOC control efficiency as required in condition D.3.1 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. The last compliance test for the thermal oxidizer was May 2004. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.5 VOC Emissions

Compliance with condition D.3.1(a) and (d) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to the previous 11 months total VOC emitted to determine VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be determined by using the following equation for VOC input:

VOC emitted = [(VOC input) x (100 - % overall control efficiency)]

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

D.3.6 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1410 ^{0}F. A 3-hour average temperature that is below 1410 ^{0}F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.3.1, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.3.7 Record Keeping Requirements

(a) To document compliance with condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission and usage limits established in condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a 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 calculated weight of the VOC per volume of coating solids, for each coating used (lb VOC / gal solids).

(4) The monthly cleanup solvent usage.

(5) The total VOC usage for each month.

(6) The weight of VOC emitted for each compliance period.

(b) To document compliance with condition D.3.6, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

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

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with condition D.3.1(d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(e) One (1) Extrusion Line, identified as EU005, constructed in 1996, consisting of one (1) extruder, calendar rolls, and one (1) oven, utilizing thermal oxidizer No. 2 ,C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;.

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6][326 IAC 2-2]

(a) Pursuant to CP 009-5147-00004, issued on June 4, 1996 and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), a thermal oxidizer with a minimum combustion chamber temperature of 1400° F, using a 3-hour rolling average or a more appropriate temperature as determined by the most recent stack test data, for a minimum overall efficiency of 90%, shall be operated at all times the Extrusion Line is in operation. This is accepted by OAQ as a Best Available Control Technology (BACT) for this facility. Therefore, the Extrusion Line complies with this rule.

(b) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the usage of VOC, including coatings, dilution solvents, and cleaning solvents, shall be limited to 280 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and the thermal oxidizer shall achieve a minimum overall control efficiency of 95% for VOC emission control. Compliance with this condition shall limit the potential to emit VOC from the Extrusion Line to less than 40 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer at all times when the Extrusion Line is operating to achieve compliance with conditions D.4.1.

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after the issuance of the permit, the Permittee shall conduct a performance test to verify VOC control efficiency as required in condition D.4.1 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.4.5 VOC Emissions

Compliance with condition D.4.1 (a) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to the previous 11 months total VOC emitted to determine VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be determined by using the following equation for VOC input:

VOC emitted = [(VOC input) x (100 - % overall control efficiency)]

D.4.6 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1441 ^{0}F on a 3-hour average.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.4.1, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

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

D.4.7 Record Keeping Requirements

(a) To document compliance with conditions D.4.1 and D.4.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit for the Extrusion Line established in condition D.4.1 and the compliance determination condition in D.4.6.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a 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 monthly cleanup solvent usage.

(4) The total VOC usage for each month.

(5) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

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

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with condition D.4.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(g) Three (3) boilers, identified as EU008, EU009, and EU010, each constructed in 1986, each with a maximum heat input capacity of 12.553 MMBtu per hour, each combusting natural gas and No.2 Fuel Oil, exhausting to stacks S/V 001-005, 001-006, and 001-007, respectively;

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

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

D.5.1 Sulfur Dioxide (SO2) [326 IAC 7-1.1-1] [326 IAC 7-2-1][326 IAC 2-2]

Pursuant to 326 IAC 7-1.1-1:

(a) The combined SO_2 emissions from the three (3) boilers shall be no greater than five-tenths (0.5) pound per million Btu for fuel oil combustion.

(a) The maximum fuel oil sulfur content shall be limited to less than 0.24% sulfur by weight.

Compliance with D.5.1(b) shall also satisfy the requirements of D.5.1(a). Compliance with these limitations shall limit the SO_2 emissions from the three (3) boilers to less than 40 tons per 12 consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall make the requirements of 326 IAC 2-2 (PSD) not applicable.

D.5.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the three (3) boilers, based on a total heat input rate of 37.66 MMBtu per hour, shall be limited to 0.42 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.5.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the three (3) 12.553 MMBtu/hr boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.5.5 Visible Emissions Notations

(a) Visible emission notations of the three (3) boiler stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere and burning oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.5.6 Reporting Requirements

The natural gas boiler certification 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 six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.5.7 Record Keeping Requirements

(a) To document compliance with Condition D.5.5, the Permittee shall maintain records of visible emission notations of the three (3) boiler stack exhausts once per day.

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

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(h) Six (6) outdoor bulk storage tanks, identified as T001, T003, T006, T008, T009 and T012, each constructed in 1988, 1976, 1986, 1999, 1985 and 2000, respectively, each with a maximum tank capacity of 30,000, 20,000, 30,000, 275, 275 and 275 gallons, respectively, each containing volatile organic liquids with maximum true vapor pressure less than 15.0 kPa.

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

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

D.6.1 Record Keeping Requirements [326 IAC 12][40 CFR 60.110b, Subpart Kb]

(a) To document compliance with 326 IAC 12 and 40 CFR 60.110b, Subpart Kb, the Permittee shall maintain permanent records at the source in accordance with (1) and (2) below for Tanks T001 and T006:

(1) The dimension of the storage vessels;

(2) An analysis showing the capacity of the storage vessels; and

(3) Vapor pressure of each organic liquid stored in tanks T001 and T006.

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

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

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

D.7.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.7.2 Volatile Organic Compounds (VOC) [326 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) BA Coating Line, identified as EU001, constructed in 1963, consisting of the following equipment:

Two (2) coating stations (coating stations 1 and 2), installed in 1963, and one (1) coating station (coating station 3), installed in 1995, each applying coatings with methods including, but not limited to, gravure, reverse roll, extrusion die, hopper/knife, and/or slot die, utilizing thermal oxidizer No. 2, identified as C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;

(b) One (1) BC-1 Coating Line, identified as EU002, constructed in 1963 and 1986, consisting of the following equipment:

One (1) coating station, installed in 1963, and one (1) coating station installed in 1986, each applying coatings with methods including, but not limited to, pressure fed die, gravure, curtain and/or fluid bed, utilizing thermal oxidizer No. 1, identified as C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(c) One (1) BC-2 Coating Line, identified as EU003, consisting of the following equipment:

One (1) coating station, installed in 1963, applying coatings with methods including, but not limited to, wrap cast, reverse roll, gravure, and/or reverse gravure, utilizing thermal oxidizer No. 1, identified as C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001. This Coating Line was changed as per a permit issued on July 10, 1998;

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994, consisting of the following equipment: Under 40 CFR 60, Subpart RR, this facility is considered an existing pressure sensitive tape and label materials coating line.

(1) One (1) compounding room, constructed in 1994, exhausting to stack S/V 001-001;

(2) One (1) coating station, installed in 1994, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(3) One (1) coating station, approved for construction in 2007, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing an enclosure and a thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(4) Two (2) natural gas-fired drying ovens, approved for construction in 2007, with a rated capacity of 800 BTU/hr each.

(e) One (1) Extrusion Line, identified as EU005, constructed in 1996, consisting of one (1) extruder, calendar rolls, and one (1) oven, utilizing thermal oxidizer No. 2 ,C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to NESHAP Subpart JJJJ [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.3340, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 2 of 40 CFR Part 63, Subpart JJJJ in accordance with schedule in 40 CFR 63 Subpart JJJJ.

E.1.2 NESHAP Subpart JJJJ Requirements [40 CFR Part 63, Subpart JJJJ]

Pursuant to 40 CFR Part 63, Subpart JJJJ, the Permittee shall comply with the provisions of 40 CFR Part 63.3280, as specified as follows:

§ 63.3280 What is in this subpart?
This subpart describes the actions you must take to reduce emissions of organic hazardous air pollutants (HAP) from paper and other web coating operations. This subpart establishes emission standards for web coating lines and specifies what you must do to comply if you own or operate a facility with web coating lines that is a major source of HAP. Certain requirements apply to all who are subject to this subpart; others depend on the means you use to comply with an emission standard.

§ 63.3290 Does this subpart apply to me?
The provisions of this subpart apply to each new and existing facility that is a major source of HAP, as defined in § 63.2, at which web coating lines are operated.

§ 63.3300 Which of my emission sources are affected by this subpart?
The affected source subject to this subpart is the collection of all web coating lines at your facility. This includes web coating lines engaged in the coating of metal webs that are used in flexible packaging, and web coating lines engaged in the coating of fabric substrates for use in pressure sensitive tape and abrasive materials. Web coating lines specified in paragraphs (a) through (g) of this section are not part of the affected source of this subpart.

(a) Any web coating line that is stand-alone coating equipment under subpart KK of this part (national emission standards for the printing and publishing industry) which the owner or operator includes in the affected source under subpart KK.

(b) Any web coating line that is a product and packaging rotogravure or wide-web flexographic press under subpart KK of this part (national emission standards for the printing and publishing industry) which is included in the affected source under subpart KK.

(c) Web coating in lithography, screenprinting, letterpress, and narrow- web flexographic printing processes.

(d) Any web coating line subject to subpart EE of this part (national emission standards for magnetic tape manufacturing operations).

(e) Any web coating line that will be subject to the national emission standards for hazardous air pollutants (NESHAP) for surface coating of metal coil currently under development.

(f) Any web coating line that will be subject to the NESHAP for the printing, coating, and dyeing of fabric and other textiles currently under development. This would include any web coating line that coats both a paper or other web substrate and a fabric or other textile substrate, except for a fabric substrate used for pressure sensitive tape and abrasive materials.

(g) Any web coating line that is defined as research or laboratory equipment in § 63.3310.

§ 63.3310 What definitions are used in this subpart?
All terms used in this subpart that are not defined in this section have the meaning given to them in the Clean Air Act (CAA) and in subpart A of this part.

Always-controlled work station means a work station associated with a dryer from which the exhaust is delivered to a control device with no provision for the dryer exhaust to bypass the control device unless there is an interlock to interrupt and prevent continued coating during a bypass. Sampling lines for analyzers, relief valves needed for safety purposes, and periodic cycling of exhaust dampers to ensure safe operation are not considered bypass lines.
Applied means, for the purposes of this subpart, the amount of organic HAP, coating material, or coating solids (as appropriate for the emission standards in § 63.3320(b)) used by the affected source during the compliance period.

As-applied means the condition of a coating at the time of application to a substrate, including any added solvent.

As-purchased means the condition of a coating as delivered to the user.

Capture efficiency means the fraction of all organic HAP emissions generated by a process that is delivered to a control device, expressed as a percentage.

Capture system means a hood, enclosed room, or other means of collecting organic HAP emissions into a closed-vent system that exhausts to a control device.

Car-seal means a seal that is placed on a device that is used to change the position of a valve or damper (*e.g.,* from open to closed) in such a way that the position of the valve or damper cannot be changed without breaking the seal.

Coating material(s) means all inks, varnishes, adhesives, primers, solvents, reducers, and other coating materials applied to a substrate via a web coating line. Materials used to form a substrate are not considered coating materials.

Control device means a device such as a solvent recovery device or oxidizer which reduces the organic HAP in an exhaust gas by recovery or by destruction.

Control device efficiency means the ratio of organic HAP emissions recovered or destroyed by a control device to the total organic HAP emissions that are introduced into the control device, expressed as a percentage.

Day means a 24-consecutive-hour period.

Deviation means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source:
(1) Fails to meet any requirement or obligation established by this subpart including, but not limited to, any emission limitation (including any operating limit) or work practice standard;
(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
(3) Fails to meet any emission limitation (including any operating limit) or work practice standard in this subpart during start-up, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Existing affected source means any affected source the construction or reconstruction of which is commenced on or before September 13, 2000, and has not undergone reconstruction as defined in § 63.2.

Fabric means any woven, knitted, plaited, braided, felted, or non-woven material made of filaments, fibers, or yarns including thread. This term includes material made of fiberglass, natural fibers, synthetic fibers, or composite materials.

Facility means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

Flexible packaging means any package or part of a package the shape of which can be readily changed. Flexible packaging includes, but is not limited to, bags, pouches, labels, liners and wraps utilizing paper, plastic, film, aluminum foil, metalized or coated paper or film, or any combination of these materials.

Formulation data means data on the organic HAP mass fraction, volatile matter mass fraction, or coating solids mass fraction of a material that is generated by the manufacturer or means other than a test method specified in this subpart or an approved alternative method.

HAP means hazardous air pollutants.

HAP applied means the organic HAP content of all coating materials applied to a substrate by a web coating line at an affected source.

Intermittently-controlled work station means a work station associated with a dryer with provisions or the dryer exhaust to be delivered to or diverted from a control device through a bypass line, depending on the position of a valve or damper. Sampling lines for analyzers, relief valves needed for safety purposes, and periodic cycling of exhaust dampers to ensure safe operation are not considered bypass lines.

Metal coil means a continuous metal strip that is at least 0.15 millimeter (0.006 inch) thick which is packaged in a roll or coil prior to coating. After coating, it may or may not be rewound into a roll or coil. Metal coil does not include metal webs that are coated for use in flexible packaging.

Month means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

Never-controlled work station means a work station that is not equipped with provisions by which any emissions, including those in the exhaust from any associated dryer, may be delivered to a control device.

New affected source means any affected source the construction or reconstruction of which is commenced after September 13, 2000.

Overall organic HAP control efficiency means the total efficiency of a capture and control system.

Pressure sensitive tape means a flexible backing material with a pressuresensitive adhesive coating on one or both sides of the backing. Examples include, but are not limited to, duct/duct insulation tape and medical tape.

Research or laboratory equipment means any equipment for which the primary purpose is to conduct research and development into new processes and products where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce except in a *de minimis* manner.

Rewind or cutting station means a unit from which substrate is collected at the outlet of a web coating line.

Uncontrolled coating line means a coating line consisting of only nevercontrolled work stations.

Unwind or feed station means a unit from which substrate is fed to a web coating line.

Web means a continuous substrate (*e.g.,* paper, film, foil) which is flexible enough to be wound or unwound as rolls.

Web coating line means any number of work stations, of which one or more applies a continuous layer of coating material across the entire width or any portion of the width of a web substrate, and any associated curing/drying equipment between an unwind or feed station and a rewind or cutting station.

Work station means a unit on a web coating line where coating material is deposited onto a web substrate.

§ 63.3320 What emission standards must I meet?

(a) If you own or operate any affected source that is subject to the requirements of this subpart, you must comply with these requirements on and after the compliance dates as specified in § 63.3330.

(b) You must limit organic HAP emissions to the level specified in paragraph (b)(1) of this section.

(1) No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.

(c) You must demonstrate compliance with this subpart by following the procedures in § 63.3370.

§ 63.3330 When must I comply?

(a) If you own or operate an existing affected source subject to the provisions of this subpart, you must comply by the compliance date. The compliance date for existing affected sources in this subpart is December 5, 2005. You must complete any performance test required in § 63.3360 within the time limits specified in § 63.7(a)(2).

§ 63.3340 What general requirements must I meet to comply with the standards?
Table 2 to this subpart specifies the provisions of subpart A of this part that apply if you are subject to this subpart, such as startup, shutdown, and malfunction plans (SSMP) in § 63.6(e)(3) for affected sources using a control device to comply with the emission standards.

§ 63.3360 What performance tests must I conduct?

(a) A summary of how you must demonstrate compliance follows:

If you control organic HAP on any individual web coating line or any group of web coating lines by:	You must:
(1) Limiting organic HAP or volatile matter content of coatings.	Determine the organic HAP or volatile matter and coating solids content of coating materials according to procedures in § 63.3360(c) and (d). If applicable, determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere according to § 63.3360(g).

(c) *Organic HAP content.* If you determine compliance with the emission standards in § 63.3320 by means other than determining the overall organic HAP control efficiency of a control device, you must determine the organic HAP mass fraction of each coating material "as-purchased" by following one of the procedures in paragraphs (c)(1) through (3) of this section, and determine the organic HAP mass fraction of each coating material "as-applied" by following the procedures in paragraph (c)(4) of this section. If the organic HAP content values are not determined using the procedures in paragraphs (c)(1) through (3) of this section, the owner or operator must submit an alternative test method for determining their values for approval by the Administrator in accordance with § 63.7(f). The recovery efficiency of the test method must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.

(1) *Method 311.* You may test the coating material in accordance with Method 311 of appendix A of this part. The Method 311 determination may be performed by the manufacturer of the coating material and the results provided to the owner or operator. The organic HAP content must be

calculated according to the criteria and procedures in paragraphs (c)(1)(i) through (iii) of this section.

(i) Include each organic HAP determined to be present at greater than or equal to 0.1 mass percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 mass percent for other organic HAP compounds.

(ii) Express the mass fraction of each organic HAP you include according to paragraph (c)(1)(i) of this section as a value truncated to four places after the decimal point (for example, 0.3791).

(iii) Calculate the total mass fraction of organic HAP in the tested material by summing the counted individual organic HAP mass fractions and truncating the result to three places after the decimal point (for example, 0.763).

(2) *Method 24.* For coatings, determine the volatile organic content as mass fraction of nonaqueous volatile matter and use it as a substitute for organic HAP using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to you.

(3) *Formulation data.* You may use formulation data to determine the organic HAP mass fraction of a coating material. Formulation data may be provided to the owner or operator by the manufacturer of the material. In the event of an inconsistency between Method 311 (appendix A of 40 CFR part 63) test data and a facility's formulation data, and the Method 311 test value is higher, the Method 311 data will govern. Formulation data may be used provided that the information represents all organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used.

(4) *As-applied organic HAP mass fraction.* If the as-purchased coating material is applied to the web without any solvent or other material added, then the as-applied organic HAP mass fraction is equal to the as-purchased organic HAP mass fraction. Otherwise, the as-applied organic HAP mass fraction must be calculated using Equation 1a of § 63.3370.

(d) *Volatile organic and coating solids content.* If you determine compliance with the emission standards in § 63.3320 by means other than determining the overall organic HAP control efficiency of a control device and you choose to use the volatile organic content as a surrogate for the organic HAP content of coatings, you must determine the as-purchased volatile organic content and coating solids content of each coating material applied by following the procedures in paragraph (d)(1) or (2) of this section, and the as-applied volatile organic content and coating solids content of each coating material by following the procedures in paragraph (d)(3) of this section.

(1) *Method 24.* You may determine the volatile organic and coating solids mass fraction of each coating applied using Method 24 (40 CFR part 60, appendix A.) The Method 24 determination may be performed by the manufacturer of the material and the results provided to you. If these values cannot be determined using Method 24, you must submit an alternative technique for determining their values for approval by the Administrator.

(2) *Formulation data.* You may determine the volatile organic content and coating solids content of a coating material based on formulation data and may rely on volatile organic content data provided by the manufacturer of the material. In the event of any inconsistency between the formulation data and the results of Method 24 of 40 CFR part 60, appendix A, and the Method 24 results are higher, the results of Method 24 will govern.

(3) *As-applied volatile organic content and coating solids content.* If the as-purchased coating material is applied to the web without any solvent or other material added, then the as-applied volatile organic content is equal to the as-purchased volatile content and the as-applied coating solids content is equal to the as-purchased coating solids content. Otherwise, the as-applied volatile organic content must be calculated using Equation 1b of § 63.3370 and the as-applied coating solids content must be calculated using Equation 2 of § 63.3370.

§ 63.3370 How do I demonstrate compliance with the emission standards?

(a) A summary of how you must demonstrate compliance follows:

If you choose to demonstrate compliance by:	Then you must demonstrate that:	To accomplish this:
(1) Use of ``as-purchased'' compliant coating materials.	(i) Each coating material used at an existing affected source does not exceed 0.04 kg organic HAP per kg coating material, and each coating material used at a new affected source does not exceed 0.016 kg organic HAP per kg coating material as-purchased; or.	Follow the procedures set out in § 63.3370(b).
	(ii) Each coating material used at an existing affected source does not exceed 0.2 kg organic HAP per kg coating solids, and each coating material used at a new affected source does not exceed 0.08 kg organic HAP per kg coating solids as-purchased.	Follow the procedures set out in § 63.3370(b).
(2) Use of ``as-applied'' compliant coating materials.	(i) Each coating material used at an existing affected source does not exceed 0.04 kg organic HAP per kg coating material, and each coating material used at a new affected source does not exceed 0.016 kg organic HAP per kg coating material as-applied; or.	Follow the procedures set out in § 63.3370(c)(1). Use either Equation 1a or b of § 63.3370 to determine compliance with § 63.3320(b)(2) in accordance with § 63.3370(c)(5)(i).
	(ii) Each coating material used at an existing affected source does not exceed 0.2 kg organic HAP per kg coating solids, and each coating material used at a new affected source does not exceed 0.08 kg organic HAP per kg coating	Follow the procedures set out in § 63.3370(c)(2). Use Equations 2 and 3 of § 63.3370 to determine compliance with § 63.3320(b)(3) in accordance with § 63.3370(c)(5)(i).

	solids as-applied; or.	
	(iii) Monthly average of all coating materials used at an existing affected source does not exceed 0.04 kg organic HAP per kg coating material, and monthly average of all coating materials used at a new affected source does not exceed 0.016 kg organic HAP per kg coating material as-applied on a monthly average basis; or.	Follow the procedures set out in § 63.3370(c)(3). Use Equation 4 of § 63.3370 to determine compliance with § 63.3320(b)(2) in accordance with § 63.3370(c)(5)(ii).
	(iv) Monthly average of all coating materials used at an existing affected source does not exceed 0.2 kg organic HAP per kg coating solids, and monthly average of all coating materials used at a new affected source does not exceed 0.08 kg organic HAP per kg coating solids as-applied on a monthly average basis.	Follow the procedures set out in § 63.3370(c)(4). Use Equation 5 of § 63.3370 to determine compliance with § 63.3320(b)(3) in accordance with § 63.3370(c)(5)(ii).
(3) Tracking total monthly organic HAP applied.	Total monthly organic HAP applied does not exceed the calculated limit based on emission limitations.	Follow the procedures set out in § 63.3370(d). Show that total monthly HAP applied (Equation 6 of § 63.3370) is less than the calculated equivalent allowable organic HAP (Equation 13a or b of § 63.3370).

(b) *As-purchased "compliant" coating materials.* (1) If you comply by using coating materials that individually meet the emission standards in § 63.3320(b)(2) or (3), you must demonstrate that each coating material applied during the month at an existing affected source contains no more than 0.04 mass fraction organic HAP or 0.2 kg organic HAP per kg coating solids, and that each coating material applied during the month at a new affected source contains no more than 0.016 mass fraction organic HAP or 0.08 kg organic HAP per kg coating solids on an as-purchased basis as determined in accordance with § 63.3360(c).

(2) You are in compliance with emission standards in § 63.3320(b)(2) and (3) if each coating material applied at an existing affected source is applied as-purchased and contains no more than 0.04 kg organic HAP per kg coating material or 0.2 kg organic HAP per kg coating solids, and each coating material applied at a new affected source is applied as-purchased and contains no more than 0.016 kg organic HAP per kg coating material or 0.08 kg organic HAP per kg coating solids.

(c) *As-applied "compliant" coating materials.* If you comply by using coating materials that meet the emission standards in § 63.3320(b)(2) or (3) as-applied, you must demonstrate compliance by following one of the procedures in paragraphs (c)(1) through (4) of this section. Compliance is determined in accordance with paragraph (c)(5) of this section.

(1) *Each coating material as-applied meets the mass fraction of coating material standard (§ 63.3320(b)(2)).* You must demonstrate that each coating material applied at an existing affected source during the month contains no more than 0.04 kg organic HAP per kg coating material applied, and each coating material applied at a new affected source contains no more than 0.016 kg organic HAP per kg coating material applied as determined in accordance with paragraphs (c)(1)(i) and (ii) of this section. You must calculate the as-applied organic HAP content of as-purchased coating materials which are reduced, thinned, or diluted prior to application.

(i) Determine the organic HAP content or volatile organic content of each coating material applied on an as-purchased basis in accordance with § 63.3360(c).

(ii) Calculate the as-applied organic HAP content of each coating material using Equation 1a of this section:

$$C_{ahi} = \frac{\left(C_{hi}M_i + \sum_{j=1}^{q} C_{hij}M_{ij}\right)}{M_i + \sum_{j=1}^{q} M_{ij}} \qquad \text{Eq. 1a}$$

Where:

Cahi = Monthly average, as-applied, organic HAP content of coating material, i, expressed as a mass fraction, kg/kg.

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

Mi = Mass of as-purchased coating material, i, applied in a month, kg.

q = number of different materials added to the coating material.

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

Mi = Mass of as-purchased coating material, i, applied in a month, kg. or calculate the as-applied volatile organic content of each coating material using Equation 1b of this section:

$$C_{avi} = \frac{\left(C_{vi}M_i + \sum_{j=1}^{q} C_{vij}M_{ij}\right)}{M_i + \sum_{j=1}^{q} M_{ij}} \qquad \text{Eq. 1b}$$

Where:

Cavi = Monthly average, as-applied, volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.

Cvi = Volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.

Mi = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

Cvij = Volatile organic content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

(2) *Each coating material as-applied meets the mass fraction of coating solids standard (§ 63.3320(b)(3)).* You must demonstrate that each coating material applied at an existing affected source contains no more than 0.20 kg of organic HAP per kg of coating solids applied and each coating material applied at a new affected source contains no more than 0.08 kg of organic HAP per kg of coating solids applied. You must demonstrate compliance in accordance with paragraphs (c)(2)(i) and (ii) of this section.

(i) Determine the as-applied coating solids content of each coating material following the procedure in § 63.3360(d). You must calculate the as-applied coating solids content of coating materials which are reduced, thinned, or diluted prior to application, using Equation 2 of this section:

$$C_{asi} = \frac{\left(C_{si}M_i + \sum_{j=1}^{q} C_{sij}M_{ij}\right)}{M_i + \sum_{j=1}^{q} M_{ij}} \qquad \text{Eq. 2}$$

Where:

Csi = Coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

Mi = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

Csij = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass-fraction, kg/kg.

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

(ii) Calculate the as-applied organic HAP to coating solids ratio using Equation 3 of this section:

$$H_{si} = \frac{C_{ahi}}{C_{asi}} \qquad \text{Eq. 3}$$

Where:

Hsi = As-applied, organic HAP to coating solids ratio of coating material, i.

Cahi = Monthly average, as-applied, organic HAP content of coating material, i, expressed as a mass fraction, kg/kg.

Casi = Monthly average, as-applied, coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

(3) *Monthly average organic HAP content of all coating materials as-applied is less than the mass percent limit (§ 63.3320(b)(2)).* Demonstrate that the monthly average as-applied organic HAP

content of all coating materials applied at an existing affected source is less than 0.04 kg organic HAP per kg of coating material applied, and all coating materials applied at a new affected source are less than 0.016 kg organic HAP per kg of coating material applied, as determined by Equation 4 of this section:

$$H_L = \frac{\sum_{i=1}^{p} C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} - M_{vret}}{\sum_{i=1}^{p} M_i + \sum_{j=1}^{q} M_{ij}} \qquad \text{Eq. 4}$$

Where:

HL = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg.

p = Number of different coating materials applied in a month.

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

Mi = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in § 63.3370.

(4) *Monthly average organic HAP content of all coating materials as-applied is less than the mass fraction of coating solids limit (§ 63.3320(b)(3)).* Demonstrate that the monthly average as-applied organic HAP content on the basis of coating solids applied of all coating materials applied at an existing affected source is less than 0.20 kg organic HAP per kg coating solids applied, as determined by Equation 5 of this section:

$$H_S = \frac{\sum_{i=1}^{p} C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} - M_{vret}}{\sum_{i=1}^{p} C_{Si} M_i + \sum_{j=1}^{q} C_{Sij} M_{ij}} \qquad \text{Eq. 5}$$

Where:

Hs = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied.

p = Number of different coating materials applied in a month.

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

Mi = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in § 63.3370.

Csi = Coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

Csij = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass-fraction, kg/kg.

(5) The affected source is in compliance with emission standards in § 63.3320(b)(2) or (3) if:

(i) The organic HAP content of each coating material as-applied at an existing affected source is no more than 0.04 kg organic HAP per kg coating material or 0.2 kg organic HAP per kg coating solids, and the organic HAP content of each coating material as-applied at a new affected source contains no more than 0.016 kg organic HAP per kg coating material or 0.08 kg organic HAP per kg coating solids; or

(ii) The monthly average organic HAP content of all as-applied coating materials at an existing affected source are no more than 0.04 kg organic HAP per kg coating material or 0.2 kg organic HAP per kg coating solids, and the monthly average organic HAP content of all as-applied coating materials at a new affected source is no more than 0.016 kg organic HAP per kg coating material or 0.08 kg organic HAP per kg coating solids.

§ 63.3400 What notifications and reports must I submit?

(a) Each owner or operator of an affected source subject to this subpart must submit the reports specified in paragraphs (b) through (g) of this section to the Administrator:

(b) You must submit an initial notification as required by § 63.9(b).

(1) Initial notification for existing affected sources must be submitted no later than 1 year before the compliance date specified in § 63.3330(a).

(c) You must submit a semiannual compliance report according to paragraphs (c)(1) and (2) of this section.

(1) Compliance report dates.

(i) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in § 63.3330 and ending on June 30 or December 31, whichever date is the first date following the end of the calendar half immediately following the compliance date that is specified for your affected source in § 63.3330.

(ii) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date that is specified for your affected source in § 63.3330.

(iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iv) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(v) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A), you may submit the first and

subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (c)(1)(i) through (iv) of this section.

(2) The compliance report must contain the information in paragraphs (c)(2)(i) through (vi) of this section:

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

(v) For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in this subpart, the compliance report must contain the information in paragraphs (c)(2)(i) through (iii) of this section, and:

(A) The total operating time of each affected source during the reporting period.

(B) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(C) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

(e) You must submit a Notification of Compliance Status as specified in § 63.9(h).

§ 63.3410 What records must I keep?

(a) Each owner or operator of an affected source subject to this subpart must maintain the records specified in paragraphs (a)(1) and (2) of this section on a monthly basis in accordance with the requirements of § 63.10(b)(1):

(1) Records specified in § 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including:

(iii) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of § 63.3360(c);

(iv) Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of § 63.3360(d);

(vi) Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of § 63.3370(b), (c), and (d).

E.1.3 One Time Deadlines Relating to NESHAP, Subpart JJJJ

(a) The Permittee should submit initial notification by December 5, 2004.

(b) The Permittee should comply with requirements of NESHAP, Subpart JJJJ by December 5, 2005.

(c) The Permittee should submit a Notification of Compliance Status no later than August 2, 2006.

(d) The Permittee should perform any performance testing before June 4, 2006.

(e) The Permittee shall submit Semiannual Compliance Reports no later than July 31, 2006 and semiannually thereafter.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: 3 M
Source Address: 304S 075E, Hartford City, Indiana 47348
Mailing Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-7712-00004

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify)

Report (specify)

Notification (specify)

Affidavit (specify)

Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: 3 M
Source Address: 304S 075E, Hartford City, Indiana 47348
Mailing Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-7712-00004

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

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: 3 M
Source Address: 304S 075E, Hartford City, Indiana 47348
Mailing Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-7712-00004

☐ Natural Gas Only
☐ Alternate Fuel burned
From:_____ To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

Part 70 Quarterly Report

Source Name: 3M
Source Address: 304S 075E, Hartford City, Indiana 47348
Mailing Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-7712-00004
Facility: BA Coating Line
Parameter: VOC Usage
Limit: BA Coating Line VOC usage shall be limited to 5,040 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Year:_____

Month	VOC Usage (tons) This Month	VOC Usage (tons) Previous 11 Months	VOC Usage (tons) 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
Part 70 Quarterly Report

Source Name: 3 M
Source Address: 304S 075E, Hartford City, Indiana 47348
Mailing Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-7712-00004
Facility: BC-2 Coating Line
Parameter: VOC Emissions
Limit: VOC emissions shall not exceed 485 tons per twelve (12) consecutive month period, with compliance determined at the end of each month based on the formula below.

Year:_____

Month	Uncontrolled Coatings Usage This Month (tons/month)	Volume Weighted Average VOC Content of Uncontrol-led Coatings Used This Month (wt.%)	Weight of Uncontrolled VOCs Emitted This Month (tons/month)	Controlled Coatings Usage This Month (tons/month)	Volume Weighted Average VOC Content of Controlled Coatings Used This Month (wt.%)	Weight of Controlled VOCs Emitted This Month (tons/month)	Total Weight of Controlled and Uncontrolled VOCs Emitted This Month (tons/month)	Total Weight of Controlled and Uncontrolled VOCs Emitted Last 12 Months (tons/12 month)	Limit
									485
									485
									485

$E_{VOC} = (u_u * W_{u,avg}) + (u_c * W_{c,avg} * (1-c_{eff}))$ (i)

$PTE_{VOC} = (E_{VOC,this\ month} + E_{VOC,\ last\ 11\text{-}months})$ (ii)

where:
E_{VOC} = the monthly emissions of VOCs in tons per month
u_u = The total amount of uncontrolled coatings used in tons per month (when the capture system or thermal oxidizer is not operating)
$w_{u,avg}$ = the monthly usage weighted average weight percent (%) VOC of uncontrolled coatings used
u_c = the total amount of controlled coatings used in tons per month (when both the capture system and thermal oxidizer are operating)
$w_{c,avg}$ = the monthly usage weighted average weight percent (%) VOC of controlled coatings used
c_{eff} = the overall control efficiency of the control system
PTE_{VOC} = the potential to emit VOCs in tons per twelve (12) consecutive month period

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

Part 70 Quarterly Report

Source Name: 3 M
Source Address: 304S 075E, Hartford City, Indiana 47348
Mailing Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-7712-00004
Facility: VCS Coating Line
Parameter: VOC Emissions
Limit: The VCS Coating Line VOC usage shall be limited to 184 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Year:_____

Month	VOC Usage (tons) This Month	VOC Usage (tons) Previous 11 Months	VOC Usage (tons) 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

Part 70 Quarterly Report

Source Name: 3 M
Source Address: 304S 075E, Hartford City, Indiana 47348
Mailing Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-7712-00004
Facility: Extrusion Line
Parameter: VOC Emissions
Limit: Extrusion Line VOC usage shall be limited to 280 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Year:_____

Month	VOC Usage (tons) This Month	VOC Usage (tons) Previous 11 Months	VOC Usage (tons) 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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: 3 M
Source Address: 304S 075E, Hartford City, Indiana 47348
Mailing Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-7712-00004

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
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 Part 70 Significant Permit Modification and Minor Source Modification

Source Description and Location

Source Name:	3M Hartford City
Source Location:	304 South 075 East, Hartford City, Indiana 47348
County:	Blackford
SIC Code:	2672
Operation Permit No.:	009-7712-00004
Operation Permit Issuance Date:	December 9, 2003
Significant Permit Modification No.:	009-24417-00004
Minor Source Modification No.:	009-24853-00004
Permit Reviewer:	ERG/BL

Existing Approvals

The source was issued a Part 70 Operating Permit No. T009-7712-00004 on December 9, 2003. The source has since received the following approvals:

(a) Significant Permit Modification No. 009-20292-00004, issued on March 2, 2006; and

(b) Significant Permit Modification No. 009-20900-00004, issued on May 18, 2007.

County Attainment Status

The source is located in Blackford County.

Pollutant	Status
PM10	Attainment or Unclassifiable
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as attainment or unclassifiable for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

(c) Blackford County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

(e) 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.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	2.80
PM10	2.80
SO_2	83.8
VOC	1,602
CO	36.3
NO_x	43.3

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) These emissions are based upon Part 70 permit no. T009-7712-00004 issued on December 9, 2003.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Toluene	greater than 10
Methanol	greater than 10
N-Hexane	greater than 10
Formaldehyde	greater than 10
Benzene	greater than 10
Ethyl Benzene	greater than 10
Methyl Isobutyl Ketone	greater than 10
Xylene	greater than 10
TOTAL	greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0
PM10	0
SO_2	9
VOC	68
CO	9
NO_x	11
HAP	not reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by 3M Hartford City on May 29, 2007, relating to the construction and operation of two (2) new 800 BTU/hr ovens and an additional coating module and enclosure on an existing web coating line VCS Coater (EU004). VOC emissions from the VCS Coater are controlled by an existing thermal oxidizer identified as C002.

In addition, 3M Hartford City submitted an application on March 6, 2007, relating to their existing thermal oxidizer's compliance monitoring conditions. All the coating lines for this source (i.e., the BA Coating Line, identified as EU001, the BC-1 Coating Line, identified as EU002, the BC-2 Coating Line, identified as EU003, the VCS Coating Line, identified as EU004 and the Extrusion line, identified as EU005) utilize thermal oxidizers for volatile organic compound (VOC) control. The Part 70 Permit T009-7712-00004 issued on December 9, 2003 requires monitoring of both the operating temperature and pressure drop for each oxidizer.

The Permittee indicated that pressure drop is not an indicator of destruction efficiency of the thermal oxidizer, but would indicate an obstructed heat exchanger tube. A blocked tube results in a less energy efficient heat exchanger, but will not hinder destruction efficiency. When pressure drop ranges are exceeded, corrective action is implemented and processing lines are temporarily shut-down. 3M proposes the removal of these pressure drop requirements.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this document for detailed emission calculations relating to the VCS Coating Line new equipment.

Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM10	negligible
SO_2	negligible
VOC	21.9
CO	negligible
NO_x	negligible

This source modification is subject to 326 IAC 2-7-10.5(d)(3)(C) as this modification has a potential to emit less than twenty-five (25) tons per year and greater than five (5) tons per year of volatile organic compounds (VOC); MSM 009-24853-00004 was issued July 23, 2007. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification involves significant changes to existing monitoring requirements. Significant monitoring changes do not qualify as a minor permit modification or administrative amendment.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/Emission Unit	**PM**	**PM10**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Combustion (two new 800 BTU/hr ovens)	negligible	negligible	negligible	negligible	negligible	negligible	negligible
Additional Coating Station	-	-	-	9.20 *	-	-	-
Total for Modification	negligible	negligible	negligible	Less than 40.0 **	negligible	negligible	negligible
Significant Level	25	15	40	40	100	40	-

* The potential to emit VOC after control from the new coating station is 9.20 tons per year. This is determined based on a 99.0% overall control efficiency of the thermal oxidizer, which was tested by 3M on May 5-6, 2004.
** The limited potential to emit VOC of the VCS coating line specified in T009-20292-00004, issued on March 2, 2006, to render the requirements of 326 IAC 2-2 (PSD) not applicable, will remain the same. The VOC emissions from the new coating station will be incorporated into the existing limit.

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) The requirements of the NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) are included in this modification. Prior to the addition of the new coating station the VCS Coating Line was subject to 40 CFR Part 60, Subpart RR (326 IAC 12) because the line was constructed in 1994, after the December 30, 1980 applicability date of the rule. The installation of this second coating station does not change the applicable requirements.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability Determination

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

PSD applicability is discussed under the Permit Level Determination – PSD or Emission Offset section.

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

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coatings applied to labels of any substrate, or pressure sensitive tapes, or paper, plastic or metal foil by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating less water delivered to the applicator. The source has chosen to comply with this rule by installing thermal oxidizers. The modification will not adversely affect destruction efficiency or compliance with this rule.

All other state rules and compliance monitoring applicabilities shall remain unchanged as a result of this modification.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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 modification due to the removal of the pressure drop are as follows:

(a) The BA Coating Line has applicable compliance determination conditions as specified below:

(1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1441^0F. A 3-hour average temperature that is below 1441^0F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(2) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits specified in 326 IAC 8-2-5 (Paper Coating Operations) and 326 IAC 2-2 (Prevention of Significant Deterioration), as approved by IDEM.

(3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the BA Coating Line must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-2-5 (Paper Coating Operations) and 326 IAC 2-7 (Part 70).

(b) The BC-1 and BC-2 Coating Lines have applicable compliance determination conditions as specified below:

(1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1410^0F. A 3-hour average temperature that is below 1410^0F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(2) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits specified in 326 IAC 2-2 (Prevention of Significant Deterioration), as approved by IDEM.

(3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the BC-1 and BC Coating Line must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70).

(c) The VCS Coating Line has applicable compliance determination conditions as specified below:

(1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1410^0F. A 3-hour average temperature that is below 1410^0F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(2) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits specified in 326 IAC 8-2-5 (Paper Coating Operations), 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 12 (40 CFR 60.440, Subpart RR), as approved by IDEM.

(3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the VCS Coating Line must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration), 326 IAC 8-2-5 (Paper Coating Operations), 326 IAC 12 (40 CFR 60.440, Subpart RR) and 326 IAC 2-7 (Part 70).

(d) The Extrusion Line has applicable compliance determination conditions as specified below:

(1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1441^0F on a 3-hour average.

(2) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits specified in 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and 326 IAC 2-2 (Prevention of Significant Deterioration), as approved by IDEM.

(3) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

These monitoring conditions are necessary because the Extrusion Line must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T009-7712-00004 issued on December 9, 2003. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. 3M proposes the removal of thermal oxidizer pressure drop requirements. All the coating lines for this source (i.e., the BA Coating Line, identified as EU001, the BC-1 Coating Line, identified as EU002, the BC-2 Coating Line, identified as EU003, the VCS Coating Line, identified as EU004 and the Extrusion line, identified as EU005) utilize thermal oxidizers for volatile organic compound (VOC) control. The Part 70 Permit T009-7712-00004 issued on December 9, 2003 requires oxidizer operating temperature and pressure drop as compliance monitoring.

Pressure drop is not an indication of destruction efficiency, but would indicate an obstructed heat exchanger tube. A blocked tube results in a less energy efficient heat exchanger, but will not hinder destruction efficiency. When pressure drop ranges are exceeded corrective action is implemented and processing lines are temporarily shut-down. IDEM has completely removed Conditions D.1.6, D.2.6, D.3.7, and D.4.7 and revised the record keeping requirements as follows:

~~D.1.6 Parametric Monitoring~~

~~The Permittee shall record the pressure drop across the thermal oxidizer, at least once per day when the BA Coating Line is in operation. When for any one reading, the pressure drop across the thermal oxidizer is outside the normal range of +0.5 to +5.6 inches of water column or a range established in the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

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

~~D.1.7~~**D.1.6** Record Keeping Requirements

. . .

(b) To document compliance with condition~~s~~ D.1.5 ~~and D.1.6~~, the Permittee shall maintain ~~the following:~~

~~(1) C~~**c**ontinuous temperature records ~~(on a 3-hour average basis)~~ for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

~~(2) Daily records of the duct pressure.~~

. . .

~~D.1.8~~ **D.1.7** Reporting Requirements

. . .

~~D.2.6 Parametric Monitoring for Compliance with Limits in D.2.3 (BC-2 Line)~~

~~The Permittee shall record the pressure drop across the thermal oxidizer, at least once per day when the BC-2 Coating Line is in operation. When for any one reading, the pressure drop across the thermal oxidizer is outside the normal range of +0.5 to +5 inches of water column or a range established in the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

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

D.2.7 Record Keeping Requirements

. . .

(b) To document compliance with condition~~s~~ D.2.5 ~~and D.2.6~~, the Permittee shall maintain ~~the following~~:

~~(1)~~ ~~C~~**c**ontinuous temperature records ~~(on a 3-hour average basis)~~ for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

~~(2) Daily records of the duct pressure.~~

. . .

~~D.2.8~~**D.2.7** Reporting Requirements

. . .

~~D.3.7 Parametric Monitoring~~

~~The Permittee shall record the pressure drop across the thermal oxidizer, at least once per day when the VCS Coating Line is in operation. When for any one reading, the pressure drop across the thermal oxidizer is outside the normal range of +0.5 to +5 inches of water column or a range established in the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

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

~~D.3.8~~**D.3.7** Record Keeping Requirements

. . .

(b) To document compliance with condition~~s~~ D.3.6 ~~and D.3.7~~, the Permittee shall maintain ~~the following~~:

~~(1)~~ ~~C~~**c**ontinuous temperature records ~~(on a 3-hour average basis)~~ for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

~~(2) Daily records of the duct pressure.~~

. . .

~~D.3.9~~ **D.3.8** Reporting Requirements

. . .

~~D.4.7 Parametric Monitoring~~

~~The Permittee shall record the pressure drop across the thermal oxidizer, at least once per day when the Extrusion Line is in operation. When for any one reading, the pressure drop across the thermal oxidizer is outside the normal range of +0.5 to +5.6 inches of water column or a range established in the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

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

~~D.4.8~~**D.4.7** Record Keeping Requirements

(a) To document compliance with conditions D.4.1~~,~~ **and** D.4.6 ~~and D.4.7~~, the Permittee shall maintain records in accordance with (1) through **(5)** ~~(6)~~ below. Records maintained for (1) through **(5)** ~~(6)~~ shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit for the Extrusion Line established in condition D.4.1 and the compliance determination condition~~s~~ in D.4.6 ~~and D.4.7~~.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a 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 monthly cleanup solvent usage.

(4) The total VOC usage for each month.

(5) The continuous temperature records ~~(on a 3-hour average basis)~~ for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

~~(6) Daily records of the duct pressure.~~

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

~~D.4.9~~**D.4.8** Reporting Requirements

. . .

2. 3M proposes to construct and operate two (2) new 800 BTU/hr ovens and an additional coating module and enclosure on an existing web coating line VCS Coater (EU004). The following changes have been made to the permit as a result of the modification.

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

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

. . .

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994, consisting of the following equipment: **Under 40 CFR 60, Subpart RR, this facility is considered an existing pressure sensitive tape and label materials coating line.**

(1) One (1) compounding room, constructed in 1994, exhausting to stack S/V 001-001;

(2) One (1) coating station, installed in 1994, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(3) One (1) coating station, approved for construction in 2007, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing an enclosure and a thermal oxidizer No. 1, C001, for volatile organic

compound (VOC) control, exhausting to stack S/V 888-001; and

(4) Two (2) natural gas-fired drying ovens, approved for construction in 2007, with a rated capacity of 800 BTU/hr each.

. . .

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994, consisting of the following equipment: **Under 40 CFR 60, Subpart RR, this facility is considered an existing pressure sensitive tape and label materials coating line.**

(1) One (1) compounding room, constructed in 1994, exhausting to stack S/V 001-001;

(2) One (1) coating station, installed in 1994, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(3) One (1) coating station, approved for construction in 2007, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing an enclosure and a thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(4) Two (2) natural gas-fired drying ovens, approved for construction in 2007, with a rated capacity of 800 BTU/hr each.

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

. . .

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5][326 IAC 2-2][326 IAC 12] [40 CFR 60.442]

. . .

(d) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC usage **including clean-up solvents** at ~~this facility~~ **the VCS Coating Line (EU004)** shall be limited to 184 tons per year, and the thermal oxidizer shall achieve a minimum overall control efficiency of 95% for VOC emission control. Compliance with this limitation shall limit this modification to less than the PSD major modification VOC significant emission rate threshold of 40 tpy. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

. . .

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after the **initial startup of the coating station** ~~issuance of the permit~~, the Permittee shall conduct a performance test to verify VOC control efficiency as required in condition D.3.1 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. **The last compliance test for the thermal oxidizer was May 2004.** Testing shall be conducted in accordance with Section C - Performance Testing.

. . .

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

. . .

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994, consisting of the following equipment: **Under 40 CFR 60, Subpart RR, this facility is considered an existing pressure sensitive tape and label materials coating line.**

(1) One (1) compounding room, constructed in 1994, exhausting to stack S/V 001-001;

(2) One (1) coating station, installed in 1994, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(3) One (1) coating station, approved for construction in 2007, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing an enclosure and a thermal oxidizer No. 1, C001, for volatile organic compound (VOC) control, exhausting to stack S/V 888-001;

(4) Two (2) natural gas-fired drying ovens, approved for construction in 2007, with a rated capacity of 800 BTU/hr each.

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

3. Upon further review, IDEM, OAQ has decided to add the specific mail codes (MC) for each of the IDEM branches to improve mail delivery, as follows:

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue

Air Compliance Section: **MC 61-53 IGCN 1003**
Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Compliance Data Section: **MC 61-53 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**
Indianapolis, Indiana 46204-2251

4. The following minor typographical errors were corrected.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

. . .

(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~~ **one hundred** ~~and~~ twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

. . .

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

. . .

(c) If there is a "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, **other than projects** ~~or~~ at a source with a Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) **and/or IAC 2-3-1(mm)**), the Permittee shall comply with following:

5. The source mailing address has been revised and the source status has been clarified. The report forms were revised to indicate the new mailing address as follows:

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

The Permittee owns and operates a tapes, labels and extruded web manufacturing plant.

Source Address:	304S 075E, Hartford City, Indiana 47348
Mailing Address:	~~Environmental Technology & Services, Building 42-2E-27,~~ ~~P.O. Box 33331, St. Paul, Minnesota, 55133-3331~~ **304S 075E, Hartford City, Indiana 47348**
SIC Codes:	2672, 3081
County Location:	Blackford
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Major Source, Section 112 of the Clean Air Act **Not 1 of 28 Source Categories**

. . .

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	3 M
Source Address:	304S 075E, Hartford City, Indiana 47348
Mailing Address:	~~Environmental Technology & Services, Building 42-2E-27~~ ~~P.O. Box 33331, St. Paul, Minnesota, 55133-3331~~ **304S 075E, Hartford City, Indiana 47348**
Part 70 Permit No.:	T009-7712-00004

. . .

Conclusion and Recommendation

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 009-24417-00004 and Minor Source Modification 009-24853-00004. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion

Company Name: 3M Hartford City
Address: 304 South 075 East, Hartford City, IN 47348
Title V SPM: 009-24417-00004
Reviewer: ERG/BL
Date: June 22, 2007

Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMSCF/yr)
1.60E-03	1.37E-02

	Pollutant					
	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.50	84.0
Potential to Emit (tons/yr)	1.31E-05	5.22E-05	4.12E-06	6.87E-04	3.78E-05	5.77E-04

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.
**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

Methodology
Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
HAPs Emissions from Natural Gas Combustion
MM BTU/HR <100
Insignificant Combustion

Company Name: 3M Hartford City
Address: 304 South 075 East, Hartford City, IN 47348
Title V SPM: 009-24417-00004
Reviewer: ERG/BL
Date: June 22, 2007

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMSCF)	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
Potential to Emit (tons/yr)	1.44E-08	8.24E-09	5.15E-07	1.24E-05	2.34E-08

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMSCF)	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential to Emit (tons/yr)	3.44E-09	7.56E-09	9.62E-09	2.61E-09	1.44E-08

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Tables 1.4-2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
VCS Coating Station, Additional Coating Station

Company Name: 3M Hartford City
Address: 304 South 075 East, Hartford City, IN 47348
Title V SPM: 009-24417-00004
Reviewer: ERG/BL
Date: June 22, 2007

	PTE VOC (lbs/hr) *	PTE VOC, Before Controls (tons/yr)	Destruction Efficiency (%) **	PTE VOC After Controls (tons/yr)
Additional Coating Station	5.00	21.9	99.1%	0.20

* Worst case primer coating applied, it is assumed that all the VOCs in the coating are emitted as a part of this process.
** Thermal Oxidizer performance testing results provided by the Permittee (test conducted May 5-6, 2004).
PM emissions are zero because, solvents are applied using roll coating (rotogravure) process where the transfer efficiency of solids is 100%.

Methodology
Potential to Emit, Before Control (tons/yr) = Potential to Emit (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs
Potential to Emit, After Control (tons/yr) = Potential to Emit (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs x (100- Destruction Efficiency)

Appendix A: Emission Calculations
Summary

Company Name: 3M Hartford City
Address: 304 South 075 East, Hartford City, IN 47348
Title V SPM: 009-24417-00004
Reviewer: ERG/BL
Date: June 22, 2007

	Potential To Emit (tons/year)						
Process/emission unit	PM	PM10	SO_2	VOC	CO	NOx	HAPs
Combustion	negligible	negligible	negligible	negligible	negligible	negligible	negligible
New Coating Station	-	-	-	21.9	-	-	-
Total	negligible	negligible	negligible	21.9	negligible	negligible	negligible

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM10	SO_2	VOC	CO	NOx	HAPs
Combustion	negligible	negligible	negligible	negligible	negligible	negligible	negligible
New Coating Station	-	-	-	9.20 *	-	-	-
Total	negligible	negligible	negligible	9.20 *	negligible	negligible	negligible

* VOC from the entire VCS coating line remains limited pursuant to T009-20292-00004, issued on March 2, 2006, to render the requirements of 326 IAC 2-2 (PSD) not applicable. The controlled potential to emit VOC from this facility is equal to 9.20 tons per year. According to a recent stack test conducted by 3M on May 5-6, 2004, the overall control efficiency of the thermal oxidizer was determined to be 99.1%.