



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 17, 2007

RE: EIS Fibercoating, Inc. / 017-24687-00039

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 03/23/06



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August 17, 2007

Ms. Megan Schultz
EIS Fibercoating, Inc.
616 East Main Street
Logansport, Indiana 46947

Re: 017-24687-00039
Second Minor Permit Revision to
FESOP 017-15789-00039

Dear Ms. Schultz:

EIS Fibercoating, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on January 8, 2003 for a rubber extrusion and coating plant. A letter requesting changes to this permit was received on April 26, 2007. Pursuant to the provisions of 326 IAC 2-8-11.1, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of converting an existing flock adhesive application station (L4) into a graphics line for sheet goods flocking (GL2) and the construction of a new graphics line for sheet goods flocking (GL1). Two (2) space heaters will be added to the insignificant activities equipment listing. Also, two (2) flock adhesive stations (L5 and L6) have been removed. The new and modified units are as follows:

- (a) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (b) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, consisting of two (2) space heaters, each with a maximum heat input capacity of 0.35 MMBtu/hr.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. 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 Mr. Stephen Treimel, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Mr. Treimel. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, 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,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/ST

cc: File - Cass County
U.S. EPA, Region V
Cass County Health Department
Air Compliance Section Inspector – Dave Rice
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner
Billing, Licensing and Training Section - Dan Stamatkin



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**EIS Fibercoating, Inc.
616 East Main Street
Logansport, Indiana 46947**

(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.

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

Operation Permit No.: T 017-15789-00039	
Original Signed by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 8, 2003 Expiration Date: January 8, 2008

First Minor Permit Revision No.: No. 017-18432-00039, issued on April 24, 2004
Administrative Amendment No. 017-18929-00039, issued on April 30, 2004

Second Minor Permit Revision No.: 017-24687-00039	Pages Affected: All
Issued by:Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 17, 2007 Expiration Date: January 8, 2008

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Stratospheric Ozone Protection

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a rubber extrusion and coating plant.

Source Address:	616 East Main Street, Logansport, Indiana 46947
Mailing Address:	616 East Main Street, Logansport, Indiana 46947
General Source Phone:	(574) 722-5192
SIC Code:	3069 and 3089
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Five (5) flock adhesive application lines with primer usage (identified as L1, EL1, EL2, 3B2, and BL, and constructed in 1984, 1988, 1996, 1988, and 1987), each with a maximum primer usage of 0.04 gallons per hour and a maximum flock adhesive usage of 0.71 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L1, EL1, EL2, 3B2, and BL, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.
- (b) Two (2) flock adhesive application lines without primer usage (identified as L2 and L3, and constructed in 1987), each with a maximum flock adhesive usage of 0.86 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L2 and L3, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.
- (c) One (1) flock adhesive application line, identified as Nisco Line (constructed in 2002), with a maximum flock adhesive usage of 0.06 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.
- (d) One (1) flock adhesive application line, identified as Lock Knob Line (constructed in 1987), with a maximum flock adhesive usage of 0.25 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.
- (e) One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line (constructed in 1989), with a maximum primer usage of 0.75 gallons per hour, and flock adhesive usage of 1.5 gallons per hour, using drip and wipe or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a

stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.

- (f) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (g) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) One (1) hot water boiler, with a maximum heat input of 0.15 MMBtu/hr.
 - (2) One (1) furnace, with a maximum heat input of 0.15 MMBtu/hr.
 - (3) One (1) furnace, with a maximum heat input of 0.4 MMBtu/hr.
 - (4) Three (3) space heaters, each with a maximum heat input of 0.15 MMBtu/hr.
 - (5) One (1) space heater, with a maximum heat input of 0.4 MMBtu/hr.
 - (6) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.
 - (7) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.
 - (8) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.
- (b) Electric infrared cure equipment.
- (c) Paved and unpaved roads and parking lots with public access.

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

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit 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.

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

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information 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 submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (c) 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.
- (c) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) 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 contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

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

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

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ , to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ , at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ , may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal [326 IAC 2-8-9]**
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under 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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality

100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 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) **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 that the inspector be accredited is federally enforceable.

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

Any monitoring or testing performed 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.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is

operating, except for time necessary to perform quality assurance and maintenance activities.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information 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 kept 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.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Five (5) flock adhesive application lines with primer usage (identified as L1, EL1, EL2, 3B2, and BL, and constructed in 1984, 1988, 1996, 1988, and 1987), each with a maximum primer usage of 0.04 gallons per hour and a maximum flock adhesive usage of 0.71 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L1, EL1, EL2, 3B2, and BL, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.
- (b) Two (2) flock adhesive application lines without primer usage (identified as L2 and L3, and constructed in 1987), each with a maximum flock adhesive usage of 0.86 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L2 and L3, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.
- (c) One (1) flock adhesive application line, identified as Nisco Line (constructed in 2002), with a maximum flock adhesive usage of 0.06 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.
- (d) One (1) flock adhesive application line, identified as Lock Knob Line (constructed in 1987), with a maximum flock adhesive usage of 0.25 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.
- (e) One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line (constructed in 1989), with a maximum primer usage of 0.75 gallons per hour, and flock adhesive usage of 1.5 gallons per hour, using drip and wipe or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.
- (f) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (g) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse and venting inside the building.

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

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

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

Pursuant to 326 IAC 2-8-4 (FESOP):

- (a) The amount of VOC delivered to all the adhesive application lines, primer

application at the Overhead Conveyor line, the graphics lines (GL1 and GL2), plus the amount of VOC used for clean-up shall be limited to less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The amount of any single HAP delivered to all the adhesive application lines, primer application at the Overhead Conveyor line, the graphics lines (GL1 and GL2), plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to all the adhesive application lines, primer application at the Overhead Conveyor line, the graphics lines (GL1 and GL2), plus the amount of any combination of HAPs used for clean-up shall not exceed 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The emissions of PM10 from the flocking operations on the graphics lines GL1 and GL2 shall each be limited to less than 1.14 pounds per hour.

Combined with the emissions from insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year, and the HAP emissions from the entire source are limited to less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. The PM10 emissions from the flock adhesive application lines will be controlled using filters and baghouses, such that the PM10 emissions from the entire source (including PM10 emissions from insignificant emission units) will be less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

D.1.2 VOC Emissions [326 IAC 8-1-6] and [326 IAC 2-8-11.1]

- (a) The potential to emit of VOC from each of the flock adhesive application lines # L1, L2, L3, EL1, EL2, 3B2, Nisco, Lock Knob, and BL is less than 25 tons per year. Any change or modification which may increase the potential to emit from each of the adhesive application line to 25 tons per year or more of VOC must be approved by the Office of Air Quality before any such change may occur.
- (b) The total VOC input to the Nisco Line, Lock Knob Line, and Overhead Conveyor Line (including primer and adhesive application) shall not exceed 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This shall ensure that 326 IAC 2-8-11.1(e) is not applicable.
- (c) The VOC usage in graphics line GL1 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.
- (d) The VOC usage in graphics line GL2 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.

Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) are not applicable.

- (e) Pursuant to 326 IAC 2-8-11.1(d)(5), the total VOC usage in the graphics lines GL1 and GL2 shall be limited to less than 24.9 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision), 326 IAC 8-1-6 (BACT), and 326 IAC 2-2 (PSD) not applicable to this modification.

- (f) Pursuant to 326 IAC 2-8-11.1(d)(5)(C), the PM and PM10 emissions from the flocking operations on each of the graphics lines GL1 and GL2 shall each be limited to less than 1.14 pounds per hour and the particulate emissions shall be controlled with a baghouse having an overall particulate control efficiency of at least 99% and complying with a no visible emission (0% opacity) standard. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable to this modification.

D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from each of adhesive application lines shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.4 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the flocking operations on graphics line GL1 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the flocking operations on graphics line GL2 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

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

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations in Conditions D.1.1(a), (b), (c) and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate [326 IAC 6-3-2 (d)]

Pursuant to 326 IAC 6-3-2(d) and in order to comply with D.1.3 and D.1.4, the dry filters and the baghouses for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from each flock adhesive application line and the flocking operations on the graphics lines at all times when these flock adhesive application lines and graphics lines are in operation.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stacks (L1, L2, L3, EL1, EL2, 3B2, BL, Nisco, LK, OH-1, and OH-2) while one or more of the flock adhesive application lines or primer application line are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C -

Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the flocking operations, at least once per shift when the flocking operations are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records, and Reports. 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 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other 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.1.10 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the flocking operations when venting to the atmosphere.

D.1.11 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), (b), (c), and D.1.2(a), (b), (c), (d), and (e), the Permittee shall maintain records in accordance with (1) through (4) below for the flock adhesive application lines and the graphics lines. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits established in Conditions D.1.1(a), (b), (c), and D.1.2(a), (b), (c), (d), and (e).
 - (1) The HAP content and the VOC content of each coating and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAP usage for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain:
 - (1) Once per shift records of inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
 - (2) Documentation of the dates vents are redirected.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a), (b), (c), and Condition D.1.2(a), (b), (c), (d), and (e) 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 period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(1) One (1) hot water boiler, with a maximum heat input of 0.15 MMBtu/hr.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from this 0.15 MMBtu/hr boiler, which was constructed after September 21, 1983, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (2) One (1) furnace, with a maximum heat input of 0.15 MMBtu/hr.
 - (3) One (1) furnace, with a maximum heat input of 0.4 MMBtu/hr.
 - (4) Three (3) space heaters, each with a maximum heat input of 0.15 MMBtu/hr.
 - (5) One (1) space heater, with a maximum heat input of 0.4 MMBtu/hr.
 - (6) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.
 - (7) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.
 - (8) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.
- (b) Electric infrared cure equipment.
- (c) Paved and unpaved roads and parking lots with public access.

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

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

There are no specifically applicable requirements that apply to these emissions units.

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

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

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039

This form consists of 2 pages

Page 1 of 2

<p>9 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</p>
--

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, the graphics lines, and primer application at Overhead Conveyor Line
Parameter: VOC input
Limit: Less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

- 9 No deviation occurred in this quarter.
- 9 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**

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, the graphics lines, and primer application at Overhead Conveyor Line
Parameter: Single HAP input
Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

- 9 No deviation occurred in this quarter.
- 9 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**

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility Facility: All the flock adhesive application lines, the graphics lines, and primer application at Overhead Conveyor Line
Parameter: Total HAPs input
Limit: Less than 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

- 9 No deviation occurred in this quarter.
- 9 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**

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: Graphics Lines GL1 and GL2
Parameter: Total VOC input
Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

- 9 No deviation occurred in this quarter.
- 9 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**

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: Graphics Line GL1
Parameter: Total VOC input
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: Graphics Line GL2
Parameter: Total VOC input
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: Flock adhesive and primer application at Overhead Conveyor Line
Parameter: VOC input
Limit: Less than or equal to 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: Total flock adhesive and primer application at Nisco, Lock Knob and Overhead Conveyor Line
Parameter: VOC input
Limit: Less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039

Months: _____ to _____ Year: _____

Page 1 of 2

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

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 Minor Permit Revision to a
Federal Enforceable State Operating Permit (FESOP).

Source Description and Location

Source Name:	EIS Fibercoating, Inc.
Source Location:	616 E. Main Street, Logansport, Indiana 46947
County:	Cass
SIC Code:	3069 and 3089
Operation Permit No.:	F017-15789-00039
Operation Permit Issuance Date:	January 8, 2003
Second Minor Permit Revision No.:	017-24687-00039
Permit Reviewer:	ERG/ST

The OAQ has received an application from EIS Fibercoating, Inc. related to a modification to an existing rubber extrusion and coating plant.

Existing Approvals

The source was issued FESOP No. 017-15789-00039 on January 8, 2003. The source has since received the following approvals:

- (a) First Minor Permit Revision No. 017-18432-00039, issued on April 24, 2004; and
- (b) Administrative Amendment No. 017-18929-00039, issued on April 30, 2004.

County Attainment Status

The source is located in Cass County.

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

- (a) Cass County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are

considered when evaluating the rule applicability relating to ozone. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Cass County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

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	Less than 16.5
PM10	Less than 16.5
SO ₂	0.03
VOC	Less than 100
CO	3.4
NO _x	4.1
Single HAP	Less than 10
Combination HAPs	Less than 25

These figures are taken from the TSDs for FESOP 017-15789-00039 and Minor Permit Revision 017-18432-00039.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), for PM, PM10 and VOC because the Permittee has accepted limits on emissions of PM, PM10 and VOC to less than 100 tons per year of these pollutants. This existing source is not a major stationary source, under PSD (326 IAC 2-2), for SO₂, NOx and CO because none of these pollutants is emitted at a rate of 250 tons per year or more. This existing source is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed a revision application, submitted by EIS Fibercoating, Inc. on April 26, 2007, relating to the conversion of an existing flock adhesive application station (L4) into a graphics line for sheet goods flocking (GL2), the construction of a new graphics line for sheet goods flocking (GL1), and the addition of two (2) insignificant space heaters. Also, two (2) flock adhesive stations (L5 and L6) will be removed. The following is a list of the proposed emission units:

- (a) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of

glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.

- (b) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, consisting of two (2) space heaters, each with a maximum heat input capacity of 0.35 MMBtu/hr.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
GL1	Graphics Line GL1	21	1.5	5,500	ambient
GL2	Graphics Line GL1	21	1.5	5,500	ambient

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

Permit Level Determination – FESOP Revision

Pursuant to 326 IAC 2-7-1(29), 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 2-8.11.1. This table reflects the PTE of the modification before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	PTE of Revision (tons/year)
PM	54.1
PM10	54.1
SO ₂	0.005
VOC	417
CO	0.25
NO _x	0.30
HAPs	0.01

Pursuant to 326 IAC 2-8-11.1(d)(5)(C), this revision is considered a minor permit revision since the potential to emit of PM and PM10 of this modification is limited to less than twenty-five (25) tons per year by using a particulate air pollution control device that has a 99% control efficiency and complying

with a no visible emission (0% opacity) standard. Pursuant to 326 IAC 2-8-11.1(d)(7), this revision is considered a minor permit revision since the source has requested emission limits on annual usage of VOC at graphics lines GL1 and GL2 of less than 25 tons per year each to avoid the requirements of 326 IAC 8-1-6 (BACT). Therefore, the requirements of 326 IAC 8-1-6 will not be applicable.

Permit Level Determination – FESOP

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

Pollutant	PTE of the Entire Source After Revision (tons/year)
PM	Less than 26.5
PM10	Less than 26.5
SO ₂	0.02
VOC	Less than 100
CO	3.4
NO _x	4.1
Single HAP	Less than 10
Combination HAPs	Less than 25

This revision to an existing minor stationary source is not major for PSD because the increase in VOC emissions due to this modification is limited to less than 100 tons per year by conditions in the permit. This is less than the PSD major source threshold (250 tons per year).

Although the unrestricted increase in potential to emit due to this modification is greater than 25 tons per year for each of the proposed graphics lines, the Permittee has accepted limits on the increase in VOC emissions from the two (2) new graphics line (GL1 and GL2) of less than twenty-five (25) tons per year each to avoid the requirements of 326 IAC 8-1-6 for each of these graphics lines (see full discussion in the *State Rule Applicability* section of this TSD).

After this revision, this source is still a minor source pursuant to the Part 70 Permit program.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this proposed revision.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this proposed revision.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

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

PSD applicability is discussed under the Permit Level Determination – FESOP section.

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

The operation of graphics line 1 (GL1) and graphics line 2 (GL2) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter Counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-11.1 (Minor Permit Revision)

The two (2) new graphics lines (GL1 and GL2) are being added through a minor permit revision.

- (a) The flocking operations on the two (2) new graphics lines (GL1 and GL2) have total unrestricted PM and PM10 emissions in excess of 25 tons per year, but less than major source thresholds (100 tons per year). In order to make the addition of the two (2) new graphics lines (GL1 and GL2) a minor permit revision under 326 IAC 2-8-11.1(d)(5)(C), the Permittee has accepted limits on the total PM and PM10 emissions from the new graphics lines. 326 IAC 2-8-11.1(d)(5)(C) requires that graphics lines GL1 and GL2 control particulate emissions by using a particulate air pollution control device that has a 99% control efficiency and complies with a no visible emission (0% opacity) standard. The surface coating operations on graphics lines GL1 and GL2 do not create particulate emissions. The flocking operations on graphics lines GL1 and GL2 are controlled by a baghouse that exhausts inside the building. Therefore, visible emissions notations are not required. The Permittee is required under 326 IAC 2-8-11.1(d)(5)(C) to certify to the commissioner that the air pollution control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10). The following limits have been included in the permit:

Pursuant to 326 IAC 2-8-11.1(d)(5)(C), the PM and PM10 emissions from the flocking operations on each of the graphics lines GL1 and GL2 shall each be limited to less than 1.14 pounds per hour and the particulate emissions shall be controlled with a baghouse having an overall particulate control efficiency of at least 99% and complying with a no visible emission (0% opacity) standard. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) not applicable to this modification.

- (b) The two (2) new graphics lines (GL1 and GL2) have total unrestricted VOC emissions in excess of 25 tons per year. In order to make the addition of the two (2) new graphics lines (GL1 and GL2) a minor permit revision under 326 IAC 2-8-11.1(d)(5), the Permittee has requested limits on total annual usage of VOC at graphics lines GL1 and GL2 of less than 25 tons per year. By taking this limit, the Permittee also avoids the requirements of 326 IAC 8-1-6 (BACT) for these two emission units. Therefore, the requirements of 326 IAC 8-1-6 will not be applicable to this modification. Compliance with this limit also makes the requirements of 326 IAC 2-8-11.1(f) and 326 IAC 2-2 (PSD) not applicable to this modification. The following limits have been included in the permit:

Pursuant to 326 IAC 2-8-11.1(d)(5), the total VOC usage in the graphics lines GL1 and GL2 shall be limited to less than 24.9 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f), 326 IAC 8-1-6, and 326 IAC 2-2 (PSD) not applicable to this modification.

326 IAC 2-8-4 (FESOP)

The uncontrolled potential to emit of VOC and PM10 from the entire source is greater than 100 tons per year, the uncontrolled potential to emit of a single HAP is greater than ten (10) tons per year and the uncontrolled potential to emit of a combination of HAPs is greater than twenty-five (25) tons per year. The increase in potential to emit of VOC due to this modification (417 tons per year) is greater than 100 tons per year. The Permittee has chosen to accept limits on source-wide emissions of VOC, a single HAP and a combination of HAPs, and limits on emissions of PM10 from the graphics lines GL1 and GL2 in order to remain a FESOP source. Pursuant to 326 IAC 2-8-4, the following limits have been included in the permit:

- (a) The amount of VOC delivered to all the adhesive application lines, the Nisco line, the Lock Knob line, the Overhead Conveyor line, the graphics lines (GL1 and GL2), plus the amount of VOC used for clean-up shall be limited to less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the emissions from insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year.
- (b) The amount of any single HAP delivered to all the adhesive application lines, the Nisco Line, the Lock Knob Line, the Overhead line, the graphics lines (GL1 and GL2), plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to all the adhesive application lines, the Nisco line, the Lock Knob line, the Overhead Conveyor line, the graphics lines (GL1 and GL2), plus the amount of any combination of HAPs used for clean-up shall not exceed 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the emissions from insignificant activities, the HAP emissions from the entire source are limited to less than 25 tons per year for any combination of HAPs.
- (d) The emissions of PM10 from the flocking operations on the graphics lines GL1 and GL2 shall each be limited to less than 1.14 pounds per hour.

Combined with the emissions from insignificant activities, the VOC and PM10 emissions from the entire source are each limited to less than 100 tons per year, and the HAP emissions from the entire source are limited to less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 are not applicable.

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

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the flocking operations on graphics line GL1 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the flocking operations on graphics line GL2 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

The baghouses for particulate control shall be in operation at all times the graphics lines are in operation, in order to comply with this limit.

326 IAC 8-1-6 (BACT)

- (a) The graphics line identified as GL1 has a potential to emit of VOC greater than 25 tons per year. In order to make the requirements of 326 IAC 8-1-6 not applicable, the Permittee has accepted the following limit on usage of VOC at graphics line GL1.

The VOC usage in graphics line GL1 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.

- (b) The graphics line identified as GL2 has a potential to emit of VOC greater than 25 tons per year. In order to make the requirements of 326 IAC 8-1-6 not applicable, the Permittee has accepted the following limit on usage of VOC at graphics line GL2.

The VOC usage in graphics line GL2 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.

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

The graphics lines GL1 and GL2 apply coatings (adhesives) to paper sheet goods. However, the application of adhesives on these two (2) graphics lines is neither a web coating process nor a saturation process. The adhesives are applied to the paper sheet goods with a screen printing process. The adhesives do not saturate the entire sheet nor do they cover 100% of the surface of the sheet. Therefore, the requirements of 326 IAC 8-2-5 do not apply. The surface coating operations performed at the graphics lines GL1 and GL2 are not one of the type of operations regulated in 326 IAC 8-2-2 through 326 IAC 8-2-12.

Compliance Determination and Monitoring Requirements

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

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

There are no Compliance Determination Requirements or Compliance Monitoring Requirements applicable to the surface coating operations on graphics lines GL1 and GL2. The surface coating operations on these two graphics line do not result in the formation of airborne particulate.

The Compliance Determination Requirements and Compliance Monitoring Requirements applicable to the flocking operations on graphics lines GL1 and GL2 are as follows:

- (a) In the event that bag failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Section C - Response to Excursions and Exceedances shall be initiated. For any failure with corresponding response steps and timetable not described in the Section C - Response to Excursions and Exceedances, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee

satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Note: The two (2) new graphics lines are being added under a Minor Permit Revision pursuant to 326 IAC 2-8-11.1(d)(5)(C). This statute requires that the graphics lines comply with a no visible emission (0% opacity) standard. Normally, this would require the inclusion of a visible emissions notation requirement in the Compliance Monitoring section of the permit. However, the baghouses for control of particulate from the flocking operations on the graphics lines exhaust inside the building. IDEM does not require visible emissions notations for particulate sources that exhaust indoors and whose vents cannot be re-directed outdoors.

Proposed Changes

The changes listed below have been made to FESOP No. F017-15789-00039. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. IDEM, OAQ has updated the phone numbers and address for the Permits Branch and added the specific mail codes (MC) for each of the IDEM branches to improve mail delivery, as follows:

Telephone No.: 317-233-~~5674~~ **0178** (ask for Compliance Section)
Facsimile No.: 317-233-~~5967~~ **6865**

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box ~~6045~~
MC 61-53 IGCN 1003
Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Air Compliance Section: **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**

2. In order to reduce the number of administrative amendments, IDEM, OAQ has decided to remove the identification of the Authorized Individual in Condition A.1. IDEM will continue to maintain records of the name, title, and contact information for the responsible official.

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

The Permittee owns and operates a rubber extrusion and coating plant.

Authorized individual:	_____ President
Source Address:	616 East Main Street, Logansport, Indiana 46947
Mailing Address:	616 East Main Street, Logansport, Indiana 46947
General Source Phone:	(574) 722-5192
SIC Code:	3069 and 3089
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

3. Sections A.2, A.3, and D.1, and the reporting forms have been updated to include the equipment description and requirements for the proposed graphics lines, to include the new insignificant activities, and to delete equipment that has been removed. The permit has been changed as follows:

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

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

- (a) ~~Six (6)~~ **Five (5)** flock adhesive application lines with primer usage (identified as L1, ~~L4~~, EL1, EL2, 3B2, and BL, and constructed in 1984, ~~1988~~, 1988, 1996, 1988, and 1987), each with a maximum primer usage of 0.04 gallons per hour and a maximum flock adhesive usage of 0.71 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L1, ~~L4~~, EL1, EL2, 3B2, and BL, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse ~~and that~~ vents inside the building.
- (b) ~~Four (4)~~ **Two (2)** flock adhesive application lines without primer usage (identified as L2, ~~and L3, L5, and L6~~, and constructed in 1987, ~~1987, 1988, and 1988~~), each with a maximum flock adhesive usage of 0.86 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L2, ~~and L3, L5, and L6~~, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse ~~and that~~ vents inside the building.
- ~~(c) One (1) flock and topcoat adhesive application line with two (2) coating booths (identified as L1-5 and L1-6), installed with the rubber extrusion line and constructed in 2002, using either drip and wipe method or HVLP type spray guns, and venting through stacks L1-5 and L1-6. This line is equipped with a flocking operation, which is controlled by a baghouse and vents inside the building.~~
- ~~(d) One (1) rubber extrusion line, with a maximum process rate of 1,000 pounds of rubber per hour, constructed in 2002, including the following:
 - ~~(1) Two (2) rubber extruders.~~
 - ~~(2) Two (2) hot air curing ovens, using natural gas as the fuel, each with a maximum heat input rate of 7.36 MMBtu per hour, and venting through stacks L1-1, L1-2, L1-3, and L1-4.~~~~
- ~~(e)~~ **(c)** One (1) flock adhesive application line, identified as Nisco Line (constructed in 2002), with a maximum flock adhesive usage of 0.06 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco. The line is also equipped with a flocking booth which is controlled by a baghouse ~~and that~~ vents inside the building.
- ~~(f)~~ **(d)** One (1) flock adhesive application line, identified as Lock Knob Line (constructed in 1987), with a maximum flock adhesive usage of 0.25 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse ~~and that~~ vents inside the building.
- ~~(g)~~ **(e)** One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line (constructed in 1989), with a maximum primer usage of 0.75 gallons per hour, and flock adhesive usage of 1.5 gallons per hour, using drip and wipe or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse ~~and that~~ vents inside the building.
- (f)** **One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped**

with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.

- (g) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.**

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

- ...
- (7) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.**
- (8) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.**
- ...

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) ~~Six (6)~~ **Five (5)** flock adhesive application lines with primer usage (identified as L1, ~~L4~~, EL1, EL2, 3B2, and BL, and constructed in 1984, ~~1988~~, 1988, 1996, 1988, and 1987), each with a maximum primer usage of 0.04 gallons per hour and a maximum flock adhesive usage of 0.71 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L1, ~~L4~~, EL1, EL2, 3B2, and BL, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse ~~and that~~ vents inside the building.
- (b) ~~Four (4)~~ **Two (2)** flock adhesive application lines without primer usage (identified as L2, ~~and~~ L3, ~~L5, and L6~~, and constructed in 1987, ~~1987, 1988, and 1988~~), each with a maximum flock adhesive usage of 0.86 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L2, ~~and~~ L3, ~~L5, and L6~~, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse ~~and that~~ vents inside the building.
- (c) ~~One (1) flock and topcoat adhesive application line with two (2) coating booths (identified as L1-5 and L1-6), installed with the rubber extrusion line and constructed in 2002, using either drip and wipe method or HVLP type spray guns, and venting through stacks L1-5 and L1-6. This line is equipped with a flocking operation, which is controlled by a baghouse and vents inside the building.~~
- (d) ~~One (1) rubber extrusion line, with a maximum process rate of 1,000 pounds of rubber per hour, constructed in 2002, including the following:~~
 - (1) ~~Two (2) rubber extruders.~~
 - (2) ~~Two (2) hot air curing ovens, using natural gas as the fuel, each with a maximum heat input rate of 7.36 MMBtu per hour, and venting through stacks L1-1, L1-2, L1-3, and L1-4.~~
- ~~(e) (c) . . .~~
- ~~(f) (d) . . .~~
- ~~(g) (e) . . .~~
- (f) **One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.**
- (g) **One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.**

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

Pursuant to 326 IAC 2-8-4 (FESOP):

- (a) The amount of VOC delivered to all the adhesive application lines, primer application at the Overhead Conveyor line, **the graphics lines (GL1 and GL2)**, plus the amount of VOC used for clean-up shall be limited to less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any single HAP delivered to all the adhesive application lines, primer application at the Overhead Conveyor line, **the graphics lines (GL1 and GL2)**, plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to all the adhesive application lines, primer application at the Overhead Conveyor line, **the graphics lines (GL1 and GL2)**, plus the amount of any combination of HAPs used for clean-up shall not exceed 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- ~~(d) The total rubber input to the rubber extruders shall not exceed a total of 4,380 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 8.67 tons per year of VOC emissions and 4.4 tons per year of total HAPs emissions from the rubber extrusion and curing processes~~
- (d) The emissions of PM10 from the flocking operations on the graphics lines GL1 and GL2 shall be limited to less than 1.14 pounds per hour each.**

Combined with the emissions from insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year, and the HAP emissions from the entire source are limited to less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. The PM10 emissions from the flock adhesive application lines will be controlled using filters and baghouses, such that the PM10 emissions from the entire source (including PM10 emissions from insignificant emission units) will be less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

D.1.2 VOC Emissions [326 IAC 8-1-6] and [326 IAC 2-8-11.1]

- ~~(a) Pursuant to permit # 017-15417-00039, issued on June 21, 2002, the total VOC input to the flock adhesive and topcoat application line installed with the rubber extrusion line and coating booths #L1-5 and L1-6 shall not exceed 16 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(b)~~**(a)** The potential to emit of VOC from each of the flock adhesive application lines # L1, L2, L3, ~~L4, L5, L6~~, EL1, EL2, 3B2, Nisco, Lock Knob, and BL is less than 25 tons per year. Any change or modification which may increase the potential to emit from each of the adhesive application line to 25 tons per year or more of VOC must be approved by the Office of Air Quality before any such change may occur.
- ~~(e)~~**(b)** The total VOC input to the Nisco Line, Lock Knob Line, and Overhead Conveyor Line (including primer and adhesive application) shall not exceed 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This shall ensure that 326 IAC 2-8-11.1(e) is not applicable.
- (c) The VOC usage in graphics line GL1 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.**

- (d) **The VOC usage in graphics line GL2 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.**

Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) are not applicable.

- (e) **Pursuant to 326 IAC 2-8-11.1(d)(5), the total VOC usage in the graphics lines GL1 and GL2 shall be limited to less than 24.9 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision), 326 IAC 8-1-6 (BACT), and 326 IAC 2-2 (PSD) not applicable to this modification.**
- (f) **Pursuant to 326 IAC 2-8-11.1(d)(5)(C), the PM and PM10 emissions from the flocking operations on each of the graphics lines GL1 and GL2 shall each be limited to less than 1.14 pounds per hour and the particulate emissions shall be controlled with a baghouse having an overall particulate control efficiency of at least 99% and complying with a no visible emission (0% opacity) standard. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable to this modification.**

...

D.1.4 **Particulate [326 IAC 6-3-2]**

~~Pursuant to 326 IAC 6-3-2(e) (Manufacturing Processes), the allowable particulate emissions from each rubber extruder shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds per hour.~~

~~The pounds per hour limitation was calculated with the following equation:~~

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

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

- (a) **Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the flocking operations on graphics line GL1 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.**
- (b) **Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the flocking operations on graphics line GL2 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.**

...

D.1.7 **Particulate [326 IAC 6-3-2 (d)]**

Pursuant to 326 IAC 6-3-2(d) and in order to comply with D.1.3 **and D.1.4**, the dry filters and the baghouses for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from each flock adhesive application line **and the flocking operations on the graphics lines** at all times when these flock adhesive application lines **and graphics lines** are in operation.

D.1.8 **Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stacks (L1, L2, L3, ~~L4, L5, L6~~, EL1, EL2, 3B2, BL, ~~L4-5, L4-6~~, Nisco, LK, OH-1, and OH-1) while one or more of the flock adhesive application lines or primer application line are in operation. The Compliance

Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

...

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), (b), (c), and D.1.2(a), (b), (c), (d), and (e), the Permittee shall maintain records in accordance with (1) through (4) below for the flock adhesive application lines **and the graphics lines**. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits established in Conditions D.1.1(a), (b), (c), and D.1.2(a), (b), (c), (d), and (e).
- (1) The HAP content and the VOC content of each coating and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAP usage for each compliance period.
- ~~(b)~~ To document compliance with Condition D.1.1(d), the Permittee shall maintain monthly records of the total weight of rubber input.
- ~~(e)~~(b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(d)~~(c) To document compliance with Condition D.1.9, the Permittee shall maintain:
- (1) Once per shift records of inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
 - (2) Documentation of the dates vents are redirected.
- ~~(e)~~(d) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10 and the dates the vents are redirected.
- ~~(f)~~(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a), (b), (c), ~~(d)~~ and Condition D.1.2(a), (b), (c), (d), and (e) 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 period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, **the graphics lines**, and primer application at Overhead Conveyor Line
Parameter: VOC input
Limit: Less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, **the graphics lines**, and primer application at Overhead Conveyor Line
Parameter: Single HAP input
Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, **the graphics lines**, and primer application at Overhead Conveyor Line
Parameter: Total HAPs input
Limit: Less than 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
~~Facility: Rubber Extrusion Line~~
~~Parameter: Total rubber input~~
~~Limit: Less than 4,380 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
Facility: Graphics Lines GL1 and GL2
Parameter: Total VOC input
Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
 Source Address: 616 East Main Street, Logansport, Indiana 46947
 Mailing Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP No.: F017-15789-00039
 Facility: ~~The flock adhesive and topcoat application line with coating booths #L1-5 and L1-6~~
 Parameter: ~~Total VOC input~~
 Limit: ~~Less than 16 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
 Facility: **Graphics Line GL1**
 Parameter: **Total VOC input**
 Limit: **Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

...

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
 Source Address: 616 East Main Street, Logansport, Indiana 46947
 Mailing Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP No.: F017-15789-00039
 Facility: Graphics Line GL2
 Parameter: Total VOC input
 Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

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

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

Attach a signed certification to complete this report.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed FESOP Minor Permit Revision No. 017-24687-00039. The staff recommend to the Commissioner that this FESOP Minor Permit Revision be approved.

Appendix A: Emission Calculations
VOC Emissions from Screen Printing Graphics Lines

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 MPR to FESOP: 017-24687-00039
 Reviewer: ERG/ST
 Date: July 25, 2007

Emission Unit (ID)	Material	Density (lb/gal)	Weight % VOC	Weight % Water	Maximum Hourly Usage (gal/hr)	Pounds VOC per gallon of coating	PTE VOC (lb/day)	PTE VOC (ton/yr)
Graphics Line 1 (GL1) Option 1	Nazdar 6254OKI	7.03	68.6%	0%	15.0	4.82	1,736.13	316.84
	KIWO (cleanup solvent)	7.56	100%	0%	0.13	7.56	23.59	4.30
	Mineral Spirits	6.42	100%	0%	0.13	6.42	20.03	3.66
Graphics Line 1 (GL1) Option 2	Wlifix 10280FB (10265FB)	10.10	0.99%	0%	15.0	0.10	36.00	6.57
	KIWO (cleanup solvent)	7.56	100%	0%	0.13	7.56	23.59	4.30
	Mineral Spirits	6.42	100%	0%	0.13	6.42	20.03	3.66
Graphics Line 2 (GL2)	Nazdar 6254OKI	7.03	68.6%	0%	4.00	4.82	462.97	84.49
	KIWO (cleanup solvent)	7.56	100%	0%	0.13	7.56	23.59	4.30
	Mineral Spirits	6.42	100%	0%	0.13	6.42	20.03	3.66
Worst Case Totals							2,286	417

The source will only use one option for Graphics Line 1 (Option 1 or 2) at a time. Worst case totals represent worst case emissions for VOC from Option 1 or 2 for Graphics Line 1.

The coatings used do not contain any HAPs.

The coatings are applied with direct contact methods (screen printing and roll coating). No particulate is formed in the process.

METHODOLOGY

Pounds of VOC per gallon of coating (lb/gal) = Density (lb/gal) x Weight % VOC

PTE VOC (lb/day) = Pounds of VOC per gallon of coating (lb/gal) x Maximum Hourly Usage (gal/hr) x 24 hr/day

PTE VOC (ton/yr) = Pounds of VOC per gallon of coating (lb/gal) x Maximum Hourly Usage (gal/hr) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Particulate Emissions from Flocking Operations on Graphics Lines

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 MPR to FESOP: 017-24687-00039
 Reviewer: ERG/ST
 Date: July 25, 2007

PM/PM10 emissions from the flocking operations:

Emission Unit (ID)	Maximum Usage (lb/hr)	Transfer Efficiency (%)	Uncontrolled Potential to Emit PM/PM10 (ton/yr)	Control Efficiency (%)	Controlled Potential to Emit PM/PM10 (ton/yr)
Graphics Line 1 (GL1)	15	35%	42.7	99%	0.43
Graphics Line 2 (GL2)	4	35%	11.4	99%	0.11

Assume transfer efficiency of 35 % for average work. Particulate is controlled with a baghouse having a control efficiency of 99%.

METHODOLOGY

Uncontrolled Potential to Emit PM/PM10 (ton/yr) = Maximum Usage (lb/hr) x (1 - Transfer Efficiency (%)) x 8,760 hr/yr x 1 ton/2,000 lb

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

Appendix A: Emission Calculations
Combustion Emissions from Insignificant Space Heaters

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 MPR to FESOP: 017-24687-00039
 Reviewer: ERG/ST
 Date: July 25, 2007

Total Heat Input Capacity (MMBtu/hr)
0.70

Potential Throughput (MMCF/yr)
6.01

Pollutant Emission Factors (lb/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
1.9	7.6	0.6	100	84.0	5.5	1.89

Potential To Emit (ton/yr)						
PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
0.01	0.02	0.00	0.30	0.25	0.02	0.01

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

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF

Emission Factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 (hr/yr) x 1 MMCF/1,020 MMBtu

Potential to Emit (ton/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lb