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

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 29, 2007

RE: Red Spot Paint & Varnis / 163-24751-00018

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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100 North Senate Avenue
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(800) 451-6027
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Ms. Susan Henry
Red Spot Paint and Varnish Co., Inc.
1016 East Columbia Street
Evansville, IN 47711

June 29, 2007

Re: 163-24751-00018
Minor Source Modification to:
Part 70 permit Renewal No.: T163-21721-00018

Dear Ms. Henry:

Red Spot Paint and Varnish Co., Inc. was issued Part 70 Operating Permit Renewal T163-21721-00018 on December 1, 2006 for a source that mixes and blendes paints, varnishes, and lacquers. An application to modify the source was received on May 9, 2007. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) Multi-Phase Extraction Remediation Unit, approved for construction in 2007, identified as MPE-07, with a design flow rate of 200 cfm, using a catalytic oxidizer (MPE-07-CatOx) rated at 150,000 BTU/hr as control, and exhausting to stack MPE-S1, consisting of:

(1) One (1) PD Blower Pump Package;

(2) Miscellaneous Influent Manifolds;

(3) One (1) Air/Water Separator Vessel;

(4) One (1) Air/Free Product Separator Vessel;

(5) Miscellaneous Transfer Pumps;

(6) One (1) Oil/Water Separator;

(7) One (1) Effluent Surge Tank; and

(8) One (1) Air Tray Stripper.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. 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 and 326 IAC 2-7-10.5(i), 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.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This minor source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, and ask for Kristen Layton or extension 3-3031, or dial (317) 233-3031.

Original signed by,

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
KRL
cc: File - Vanderburgh County
Vanderburgh County Health Department
Evansville Environmental Protection Agency
Southwest Regional Office
Air Compliance Section Inspector - Derrick Ohning

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PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY AND THE EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

Red Spot Paint and Varnish Co., Inc.
1016 East Columbia Street
Evansville, Indiana 47711

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

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

First Minor Source Modification No.: T163-21721-00018	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 29, 2007 Expiration Date: December 1, 2011

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Emergency Occurrence Report
Quarterly Report
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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates stationary source relating to the operation of mixing and blending of paint, varnishes, thinners, and lacquers.

Source Address:	1016 East Columbia Street, Evansville, IN 47711
Mailing Address:	1016 East Columbia Street, Evansville, IN 47711
General Source Phone Number:	(812) 428-9285
SIC Code:	2851
County Location:	Vanderburgh
Source Location Status:	Nonattainment for $PM_{2.5}$ Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Nonattainment NSR 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 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:

(1) two (2) fixed roof dome tanks, identified as TF1-3 and TF1-4, each with a maximum capacity of 4,500 gallons;

(2) two (2) fixed roof dome tanks, identified as TF1-5A and TF1-5B, each with a maximum capacity of 4000 gallons; and

(3) one (1) fixed roof dome tank, identified as TF1-9, each with a maximum capacity of 10,950 gallons.

(b) One (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:

(1) three (3) fixed roof dome tanks, identified as TF2-A1, TF2-A2 and TF2-A3, each with a maximum capacity of 2,610 gallons;

(2) eight (8) fixed roof dome tanks, identified as TF2-B1, TF2-B2, TF2-C1, TF2-C2, TF2-D1, TF2-D2, TF2-E1, and TF2-E2, each with a maximum capacity of 4,040 gallons;

(3) one (1) fixed roof dome tank, identified as TF2-F1, with a maximum capacity of 8,370 gallons;

(4) two (2) fixed roof dome tanks, identified as TF2-F2 and TF2-F3, each with a maximum capacity of 4,180 gallons;

(5) two (2) fixed roof dome tanks, identified as TF2-G and TF2-I each with a maximum capacity of 6,050 gallons;

(6) one (1) fixed roof dome tank, identified as TF2-H, with a maximum capacity of 6,000 gallons; and

(7) one (1) fixed roof dome tank, identified as TF2-J, with a maximum capacity of 1,500 gallons.

(c) One (1) solvent tank farm, identified as tank farm # 4, installed in 1980, exhausting to the atmosphere, and consisting of:

(1) three (3) fixed roof dome tanks, identified as TF4-R1, TF4-R2 and TF4-R3, each with a maximum capacity of 2,300 gallons; and

(2) four (4) fixed roof dome tanks, identified as TF4-A, TF4-B, TF4-C and TF4-D, each with a maximum capacity of 2,300 gallons.

(d) One (1) solvent tank farm, identified as tank farm # 3, installed in 1980, exhausting to the atmosphere, and consisting of:

(1) one (1) fixed roof dome tank, identified as TF3-S1, with a maximum capacity of 3,500 gallons; and

(2) two (2) fixed roof dome tanks, identified as TF3-S2 and TF3-S3, each with a maximum capacity of 2,000 gallons.

(e) Paint Production operation with maximum production capacity of 2,000,000 gallons per year and consisting of the following:

(1) One (1) blending operation, identified as UV/VM production building # 1, installed in the 1930's, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of various mixing stations with capacities ranging from 700 to 3000 gallons, equipment test drops, and fourteen (14) general exhaust ducts.

(2) One (1) blending operation, identified as lacquer production building # 2, installed in 1963, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of various mixing stations with capacities ranging from 500 to 1,221 gallons, five (5) general exhaust ducts, and four (4) manhole exhaust vents.

(3) One (1) production operation, identified as main production building # 3, installed in 1967, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of various mixing stations with capacities ranging from 700 to 2500 gallons, milling units, bucket filling machines, tote cleaning units, metal dust collector, tote washing units, twenty (20) general exhaust ducts, and eight (8) manhole exhaust vents~~.~~

(4) Various portable mix tanks and totes with capacities ranging from 6 to 605 gallons.

(5) One (1) waste processing facility, identified as building # 8, installed in 1967, consisting of 5 general exhaust ducts, and exhausting to stack SV8-1.

(6) One (1) mixing operation, in building # 14, installed in 1967, exhausting to stack SV14-8, and consisting of various mixing stations with capacity of 700 gallons and three (3) general exhaust ducts.

(f) One (1) dry material handling operation with maximum capacity of 157 lb/hr, exhausting through one (1) stack.

(g) One (1) Multi-Phase Extraction Remediation Unit, approved for construction in 2007, identified as MPE-07, with a design flow rate of 200 cfm, using a catalytic oxidizer (MPE-07-CatOx) rated at 150,000 BTU/hr as control, and exhausting to stack MPE-S1, consisting of:

(1) One (1) PD Blower Pump Package;

(2) Miscellaneous Influent Manifolds;

(3) One (1) Air/Water Separator Vessel;

(4) One (1) Air/Free Product Separator Vessel;

(5) Miscellaneous Transfer Pumps;

(6) One (1) Oil/Water Separator;

(7) One (1) Effluent Surge Tank; and

(8) One (1) Air Tray Stripper.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
(1) two (2) Cleaver Brooks natural gas fired boilers located in building # 3, identified as boiler # 1 rated at 8.369 mmBtu per hour, installed in 1978, and boiler # 2 rated at 4.185 mmBtu per hour, installed in 1968; [326 IAC 6-2-3]
(2) one (1) Cleaver Brooks natural gas fired boiler located in building # 6, identified as western primary boiler, installed in 1998, rated at 4.0 mmBtu per hour; [326 IAC 6-2-4]
(3) two (2) Cleaver Brooks natural gas fired boilers located in building # 7, identified as R & D boiler # 1, and R & D boiler # 2, both installed in 1994, and each rated at 5.5 mmBtu per hour; [326 IAC 6-2-4]
(4) one (1) Cleaver Brooks natural gas fired boiler located in building # 7, identified as R & D boiler # 3, installed in 1994 and rated at 5.0 mmBtu per hour; [326 IAC 6-2-4] and
(5) one (1) natural gas fired boiler located in building # 16, identified as Weil Mclain Co. boiler, installed in 1964, and rated at 1.65 mmBtu per hour. [326 IAC 6-2-3]

(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T163-21721-00018, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Evansville EPA.

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15th of each year to:

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

(a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

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

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

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

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

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

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Evansville EPA Telephone Number: 812-435-6145
Evansville EPA Facsimile Number: 812-435-6155

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

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T163-21721-00018 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

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

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

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

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

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

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

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

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

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

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

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

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

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

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

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

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

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

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

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

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

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

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

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

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

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

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The

requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120)

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

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

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

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

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

(a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

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

The statement must be submitted to:

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville EPA makes a request for

records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville EPA within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

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

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

and

Evansville Environmental Protection Agency
CK Newsome Community Center
100 E. Walnut Street, Suite 100
Evansville, Indiana 47713

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

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

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

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

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for

motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
- (1) two (2) fixed roof dome tanks, identified as TF1-3 and TF1-4, each with a maximum capacity of 4,500 gallons;
- (2) two (2) fixed roof dome tanks, identified as TF1-5A and TF1-5B, each with a maximum capacity of 4000 gallons; and
- (3) one (1) fixed roof dome tank, identified as TF1-9, each with a maximum capacity of 10,950 gallons.

(b) One (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:
- (1) three (3) fixed roof dome tanks, identified as TF2-A1, TF2-A2 and TF2-A3, each with a maximum capacity of 2,610 gallons;
- (2) eight (8) fixed roof dome tanks, identified as TF2-B1, TF2-B2, TF2-C1, TF2-C2, TF2-D1, TF2-D2, TF2-E1, and TF2-E2, each with a maximum capacity of 4,040 gallons;
- (3) one (1) fixed roof dome tank, identified as TF2-F1, with a maximum capacity of 8,370 gallons;
- (4) two (2) fixed roof dome tanks, identified as TF2-F2 and TF2-F3, each with a maximum capacity of 4,180 gallons;
- (5) two (2) fixed roof dome tanks, identified as TF2-G and TF2-I each with a maximum capacity of 6,050 gallons;
- (6) one (1) fixed roof dome tank, identified as TF2-H, with a maximum capacity of 6,000 gallons; and
- (7) one (1) fixed roof dome tank, identified as TF2-J, with a maximum capacity of 1,500 gallons.

(c) One (1) solvent tank farm, identified as tank farm # 4, installed in 1980, exhausting to the atmosphere, and consisting of:
- (1) three (3) fixed roof dome tanks, identified as TF4-R1, TF4-R2 and TF4-R3, each with a maximum capacity of 2,300 gallons; and
- (2) four (4) fixed roof dome tanks, identified as TF4-A, TF4-B, TF4-C and TF4-D, each with a maximum capacity of 2,300 gallons.

(d) One (1) solvent tank farm, identified as tank farm # 3, installed in 1980, exhausting to the atmosphere, and consisting of:
- (1) one (1) fixed roof dome tank, identified as TF3-S1, with a maximum capacity of 3,500 gallons; and
- (2) two (2) fixed roof dome tanks, identified as TF3-S2 and TF3-S3, each with a maximum capacity of 2,000 gallons.

(e) Paint Production operation with maximum production capacity of 2,000,000 gallons per year and consisting of the following:
- (1) One (1) blending operation, identified as UV/VM production building # 1, installed in the 1930's, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of various mixing stations with capacities ranging from 700 to 3000 gallons, equipment test drops, and fourteen (14) general exhaust ducts.
- (2) One (1) blending operation, identified as lacquer production building # 2, installed in 1963, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of various mixing stations with capacities ranging from 500 to 1,221 gallons, five (5) general exhaust ducts, and four (4) manhole exhaust vents.

(3) One (1) production operation, identified as main production building # 3, installed in 1967, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of various mixing stations with capacities ranging from 700 to 2500 gallons, milling units, bucket filling machines, tote cleaning units, metal dust collector, tote washing units, twenty (20) general exhaust ducts, and eight (8) manhole exhaust vents.
(4) Various portable mix tanks and totes with capacities ranging from 6 to 605 gallons.
(5) One (1) waste processing facility, identified as building # 8, installed in 1967, consisting of 5 general exhaust ducts, and exhausting to stack SV8-1.
(6) One (1) mixing operation, in building # 14, installed in 1967, exhausting to stack SV14-8, and consisting of various mixing stations with capacity of 700 gallons and three (3) general exhaust ducts.

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

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

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

(a) The input of VOC to the paint production operations shall be limited such that the potential to emit (PTE) of VOC shall be less than 247 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used.

Compliance with the VOC mass input and VOC loss rate in conjunction with the VOC emission limits in Condition D.3.1 shall limit the source-wide VOC emissions to less than 250 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-2 (PSD) are rendered not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

(a) The input of any single HAP to the paint production operations shall be limited such that the potential to emit (PTE) of any single HAP shall be less than 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The input of total HAPs to the paint production operations shall be limited such that the potential to emit (PTE) of total HAPs shall be less than 24.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The HAP loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used.

(d) The Permittee shall not produce any varnish that is considered a bodying oil, oleo resinous material, or alkyd without prior IDEM, OAQ approval.

Compliance with above conditions in conjunction with the single and combined HAP emission limits in Condition D.3.2 shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 20 and 40 CFR 63 (NESHAP, Subpart HHHHH) are rendered not applicable.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) and Hazard Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC and HAPs limitations and solvent usage limitations contained in Conditions D.1.1 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 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.

(b) Compliance with Condition D.1.1 shall be determined using the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times C_i \times 0.015$$

where:
E = VOC emissions in pounds
i = Single component
U = VOC usage
C = VOC content
0.015 lb/lb = VOC loss rate

(c) Compliance with Condition D.1.2 shall be determined using the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times C_i \times 0.015$$

where:
E = HAP emissions in pounds
i = Single component
U = HAP usage
C = HAP content
0.015 lb/lb = HAP loss rate

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

Within 180 days after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform testing to verify the VOC and HAP loss rate utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.1.5 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC and HAPs content of each coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(2) The weight of total VOC, single HAP and total HAPs emitted for each month based on the equations utilized in Condition D.1.3(b).

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(f) One (1) dry material handling operation with maximum capacity of 157 lb/hr, exhausting through one (1) stack.

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

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

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the dry material handling shall not exceed 0.75 pounds per hour when operating at a process weight rate of 158 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(g) One (1) Multi-Phase Extraction Remediation Unit, approved for construction in 2007, identified as MPE-07, with a design flow rate of 200 cfm, using a catalytic oxidizer (MPE-07-CatOx) rated at 150,000 BTU/hr as control, and exhausting to stack MPE-S1, consisting of:
(1) One (1) PD Blower Pump Package;
(2) Miscellaneous Influent Manifolds;
(3) One (1) Air/Water Separator Vessel;
(4) One (1) Air/Free Product Separator Vessel;
(5) Miscellaneous Transfer Pumps;
(6) One (1) Oil/Water Separator;
(7) One (1) Effluent Surge Tank; and
(8) One (1) Air Tray Stripper.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

(a) Whenever the Multi-Phase Extraction Remediation Unit is in operation, the exhaust from the Multi-Phase Extraction Remediation Unit shall be vented through the catalytic oxidizer MPE-07-Catox. The catalytic oxidizer shall have a minimum overall control efficiency of 95%.

(b) The maximum total VOC inlet vapor concentration of the catalytic oxidizer shall not exceed 12,190 mg/m^3.

(c) The VOC emissions from the catalytic oxidizer shall not exceed 0.46 pound per hour.

Compliance with these limits in conjunction with the VOC limits in Condition D.1.1 shall limit the source-wide VOC emissions to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (PSD) are rendered not applicable.

D.3.2 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

(a) Whenever the Multi-Phase Extraction Remediation Unit is in operation, the exhaust from the Multi-Phase Extraction Remediation Unit shall be vented through the catalytic oxidizer MPE-07-CatOx. The catalytic oxidizer shall have a minimum single HAP overall control efficiency of 95%.

(b) Whenever the Multi-Phase Extraction Remediation Unit is in operation, the exhaust from the Multi-Phase Extraction Remediation Unit shall be vented through the catalytic oxidizer MPE-07-CatOx. The catalytic oxidizer shall have a minimum combined HAP overall control efficiency of 95%.

(c) The maximum single and total HAP inlet vapor concentration of the catalytic oxidizer shall not exceed 2,438 mg/m^3. This is equivalent to a limit of 0.09 pound of total single HAP emissions per hour.

(d) The single and total HAPs emissions from the catalytic oxidizer shall not exceed 0.09 pound per hour.

Compliance with these limits in conjunction with the single and combination HAP limits in Condition D.1.2 shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 20 and 40 CFR 63 (NESHAP, Subpart HHHHH) are rendered not applicable.

D.3.3 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for the Multi-Phase Extraction Remediation Unit and its emission control device.

Compliance Determination Requirements

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

(a) Within 180 days after initial startup, in order to demonstrate compliance with D.3.1, the Permittee shall perform VOC (including emission rate, capture and destruction efficiency) testing of the catalytic oxidizer (MPE-007-CatOx) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

(b) Within 180 days after initial startup, in order to demonstrate compliance with D.3.2, the Permittee shall perform HAP (including emission rate, capture and destruction control efficiency) testing of the catalytic oxidizer (MPE-007-CatOx) using Method 18 or other methods as approved by the Commissioner, for the HAP contained in the groundwater that has the lowest destruction efficiency, as estimated by the source and approved by IDEM. This test shall be repeated at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

(c) Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform an analysis of the inlet vapor concentration of the catalytic oxidizer once per month to determine the total VOC content of the inlet vapor.

D.3.6 Hazardous Air Pollutants (HAPs)

In order to demonstrate compliance with Condition D.3.2, the Permittee shall perform an analysis of the inlet vapor concentration of the catalytic oxidizer once per month to determine the total HAP content of the inlet vapor.

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

D.3.7 Catalytic Oxidizer Temperature [326 IAC 2-7-5(3)]

(a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring the temperature at the inlet to the catalyst bed for the catalytic oxidizer. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average inlet temperature to the catalyst bed of the catalytic oxidizer is below 600°F. A three (3) hour average temperature that is below 600°F is not considered a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall determine the three (3) hour average temperature at the inlet to the catalyst bed of the catalytic oxidizer from the most recent valid performance test that demonstrates compliance with the limits in Condition D.3.1, D.3.2, and D.3.4 as approved by IDEM.

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

D.3.8 Catalytic Oxidizer Inspections

An inspection shall be performed each calendar quarter of the exterior of the catalytic oxidizer and its connections to the Multi-Phase Extraction Remediation Unit looking for signs of physical damage, including corrosion. Any required maintenance indicated by the inspection shall be performed.

D.3.9 Catalyst Replacement

The catalysts used in the catalytic oxidizer shall be replaced within twelve (12) months of start up and at least every twelve (12) months thereafter.

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

D.3.10 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1, D.3.2, and D.3.4, the Permittee shall maintain records of the continuous inlet temperature to the catalyst bed (reduced to a three (3) hour average basis) for the catalytic oxidizer and the three (3) hour average inlet temperature to the catalyst bed used to demonstrate compliance during the most recent compliant performance test.

(b) To document compliance with Condition D.3.1 and D.3.5, the Permittee shall maintain records of the total VOC content in the inlet vapor concentration of the catalytic oxidizer.

(c) To document compliance with Condition D.3.2 and D.3.6, the Permittee shall maintain records of the total HAP content in the inlet vapor concentration of the catalytic oxidizer.

(d) To document compliance with Condition D.3.8, the Permittee shall maintain records of catalytic oxidizer inspections. These records shall include as a minimum, dates, initials of the person performing the inspection, results, and corrective actions taken (if any are required).

(e) To document compliance with Condition D.3.9, the Permittee shall maintain records of catalyst replacement.

(f) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
(1) two (2) Cleaver Brooks natural gas fired boilers located in building # 3, identified as boiler # 1 rated at 8.369 mmBtu per hour, installed in 1978, and boiler # 2 rated at 4.185 mmBtu per hour, installed in 1968; [326 IAC 6-2-3]
(2) one (1) Cleaver Brooks natural gas fired boiler located in building # 6, identified as western primary boiler, installed in 1998, rated at 4.0 mmBtu per hour; [326 IAC 6-2-4]
(3) two (2) Cleaver Brooks natural gas fired boilers located in building # 7, identified as R & D boiler # 1, and R & D boiler # 2, both installed in 1994, and each rated at 5.5 mmBtu per hour; [326 IAC 6-2-4]
(4) one (1) Cleaver Brooks natural gas fired boiler located in building # 7, identified as R & D boiler # 3, installed in 1994 and rated at 5.0 mmBtu per hour; [326 IAC 6-2-4] and
(5) one (1) natural gas fired boiler located in building # 16, identified as Weil Mclain Co. boiler, installed in 1964, and rated at 1.65 mmBtu per hour. [326 IAC 6-2-3]

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

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

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

(a) Pursuant to 326 IAC 6-2-3(d) (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the two (2) natural gas fired boilers, identified as Cleaver Brooks boilers # 2, and Weil Mclain Co. boiler, both constructed before 1972, and each rated at 4.18 and 1.65 mmBtu/hr, respectively, shall each be limited to 0.8 lbs PM/mmBtu.

(b) Pursuant to 326 IAC 6-2-3(e) (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the natural gas fired boiler, identified as Cleaver Brooks boiler #1, constructed after 1972, and rated at 8.36 mmBtu/hr, shall be limited to 0.6 lbs PM/mmBtu.

D.4.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from R & D boilers # 1, # 2, and # 3, all constructed in 1994, and each rated at 5.5, 5.5, and 5.0 mmBtu/hr respectively, shall be limited to 0.45 lbs PM/mmBtu.

(b) PM emissions from Cleaver Brooks western standby boiler, constructed in 1998, and rated at 4.0 mmBtu/hr, shall be limited to 0.435 lbs PM/mmBtu.

These limitations are based on the following equation:

$Pt = 1.09/Q^{0.26}$

where: Pt = maximum allowable particulate matter (PM) emitted per mmBtu heat input
Q = total source max. operation capacity rating (at the time when the boilers were constructed)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

AND EVANSVILLE EPA

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Red Spot Paint and Varnish Co., Inc.
Source Address: 1016 East Columbia Street, Evansville, IN 47711
Mailing Address: 1016 East Columbia Street, Evansville, IN 47711
Part 70 Permit No.: T163-21721-00018

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

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

AND EVANSVILLE EPA

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Red Spot Paint and Varnish Co., Inc.
Source Address: 1016 East Columbia Street, Evansville, IN 47711
Mailing Address: 1016 East Columbia Street, Evansville, IN 47711
Part 70 Permit No.: T163-21721-00018

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
AND EVANSVILLE EPA

Part 70 Quarterly Report

Source Name: Red Spot Paint and Varnish Co., Inc.
Source Address: 1016 East Columbia Street, Evansville, IN 47711
Mailing Address: 1016 East Columbia Street, Evansville, IN 47711
Part 70 Permit No.: T163-21721-00018
Facility: Paint Production Operation
Parameter: Total VOC emissions
Limit: VOC emissions shall be limited to less than 247 tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times C_i \times 0.015$$

where:
E = VOC emissions in pounds
i = Single component
U = VOC input
C = VOC content
0.015 lb/lb = VOC loss rate

YEAR:_____

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

☐ No deviation occurred in this month.
☐ Deviation/s occurred in this month.
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
AND EVANSVILLE EPA

Part 70 Quarterly Report

Source Name: Red Spot Paint and Varnish Co., Inc.
Source Address: 1016 East Columbia Street, Evansville, IN 47711
Mailing Address: 1016 East Columbia Street, Evansville, IN 47711
Part 70 Permit No.: T163-21721-00018
Facility: Paint Production Operation
Limit: Single HAP and total HAPs emissions shall be limited to less than 9.4 and 24.4 tons per twelve (12) consecutive month period, respectively, based on the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times C_i \times 0.015$$

where:
E = Worst case single HAP/total HAPs emissions in pounds
i = Single component
U = HAP input
C = HAP content
0.015 lb/lb = HAP loss rate

YEAR:_____

Month	Total For This Month (tons)		Total For Previous 11 Months (tons)		Total For 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

☐ No deviation occurred in this month.
☐ Deviation/s occurred in this month.
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

AND EVANSVILLE EPA

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Red Spot Paint and Varnish Co., Inc.
Source Address: 1016 East Columbia Street, Evansville, IN 47711
Mailing Address: 1016 East Columbia Street, Evansville, IN 47711
Part 70 Permit No.: T163-21721-00018

Months: _____ to _____ Year: _____

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality
and Evansville Environmental Protection Agency

Technical Support Document (TSD) for a Part 70 Minor Source and Significant Permit Modification

Source Description and Location

Source Name:	Red Spot Paint and Varnish Co., Inc.
Source Location:	1016 East Columbia St., Evansville, IN 47711
County:	Vanderburgh
SIC Code:	2851
Operation Permit No.:	T 163-21721-00018
Operation Permit Issuance Date:	December 1, 2006
Minor Source Modification No.:	163-24751-00018
Significant Permit Modification No.:	163-24762-00018
Permit Reviewer:	Kristen Layton

Existing Approvals

The source submitted an application for a Part 70 Operating Permit Renewal on December 1, 2006. No other approvals have been issued since Part 70 Operating Permit Renewal No. 163-21721-00018.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM_{10}	Attainment
$PM_{2.5}$	Nonattainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

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

(b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburg County as nonattainment for $PM_{2.5}$. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

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

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

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** (ton/yr)
PM	less than 100
PM_{10}	less than 100
SO_2	less than 100
VOC	greater than 100
CO	less than 100
NO_X	less than 100

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not 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 stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

(c) These emissions are based upon the Technical Support Document for Part 70 Operating Permit No. 163-7524-00018.

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

HAPs	**Potential To Emit** (ton/yr)
Toluene	less than 10
Ethyl benzene	less than 10
Xylene	less than 10
Methyl isobutyl ketone	less than 10
Total	**less than 25**

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are 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).

Actual Emissions

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

Pollutant	**Actual Emissions** (ton/yr)
PM	not reported
PM_{10}	0
SO_2	0
VOC	25
CO	0
NO_X	0
Total HAPs	not reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Red Spot Paint and Varnish Co., Inc. on May 9, 2007, relating to the addition of a groundwater remediation process utilizing a multi-phase extraction process. The following is a list of the proposed emission units and pollution control device:

(a) One (1) Multi-Phase Extraction Remediation Unit, approved for construction in 2007, identified as MPE-07, with a design flow rate of 200 cfm, using a catalytic oxidizer (MPE-07-CatOx) rated at 150,000 BTU/hr as control, and exhausting to stack MPE-S1, consisting of:

(1) One (1) PD Blower Pump Package;

(2) Miscellaneous Influent Manifolds;

(3) One (1) Air/Water Separator Vessel;

(4) One (1) Air/Free Product Separator Vessel;

(5) Miscellaneous Transfer Pumps;

(6) One (1) Oil/Water Separator;

(7) One (1) Effluent Surge Tank; and

(8) One (1) Air Tray Stripper.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	**Operation**	**Height** (ft)	**Diameter** (ft)	**Flow Rate** (acfm)	**Temperature** (^{0}F)
MPE-S1	MPE-07	13	0.75	750	700

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

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

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

Pollutant	**Potential To Emit** (ton/yr)
PM	Negligible
PM_{10}	Negligible
SO_2	Negligible
VOC	20.55
CO	0.1
NO_X	0.1

HAPs	**Potential To Emit** (ton/yr)
TOTAL	3.90

This source modification is subject to 326 IAC 2-7-10.5 (d)(3), "Modifications that would have a potential to emit ... less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of ... VOC." Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires a case-by-case determination of an emission limitation and involves a significant change in existing monitoring and recordkeeping.

Permit Level Determination – PSD

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

Potential to Emit (ton/yr)							
Process / Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**Total HAPs**
MPE-07	-	-	-	1.03	0.1	0.1	0.20
Major Source Threshold	250	250	250	250	250	250	25

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

Vanderburgh County has been designated as nonattainment for $PM_{2.5}$ in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in $PM_{2.5}$ Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the $PM_{2.5}$ major NSR regulations, states should assume that a major stationary source's PM_{10} emissions represent $PM_{2.5}$ emissions. IDEM will use the PM_{10} nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the $PM_{2.5}$ NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment regulated pollutant. Red Spot Paint and Varnish Co., Inc. has a limited potential to emit of PM_{10} below one hundred (100) tons per year. Therefore, assuming that PM_{10} emissions represent $PM_{2.5}$ emissions, 326 IAC 2-1.1-5, nonattainment NSR does not apply for $PM_{2.5}$.

Federal Rule Applicability Determination

NSPS:

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

NESHAP:

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

CAM:

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

CAM Applicability Analysis							
Emission Unit	**Control Device Used**	**Emission Limitation** (Y/N)	**Uncontrolled VOC PTE** (ton/yr)	**Controlled VOC PTE** (ton/yr)	**Part 70 Major Source Threshold** (ton/yr)	**CAM Applicable** (Y/N)	**Large Unit** (Y/N)
MPE-07	Catalytic Oxidizer	Y	20.55	1.03	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the new unit as part of this modification.

All other federal rule applicabilities remain unchanged as a result of this modification.

State Rule Applicability Determination

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the facility 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 8-1-6 (New facilities; general reduction requirements)
Provisions of 326 IAC 8-1-6 apply to facilities located in any county constructed after January 1, 1980, which are not otherwise regulated by any other provisions of 326 IAC 8, and have potential emissions of 25 tons/yr or greater. All the effected facilities at the source were constructed prior to January 1, 1980, except the tank farms # 3 and # 4 and the Multi-Phase Extraction Remediation Unit. The tank farms (constructed in 1980) and the Multi-Phase Extraction Remediation Unit (approved for construction in 2007), have potential VOC emissions less than 25 tons/yr and are therefore not subject to the requirements of 326 IAC 8-1-6.

All other state rule applicabilities remain unchanged as a result of this modification.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Determination and Compliance Monitoring Requirements applicable to this modification are as follows:

(1) Testing Requirements

(a) Within 180 days after initial startup, in order to demonstrate compliance with D.3.1, the Permittee shall perform VOC (including emission rate, capture and destruction efficiency) testing to verify overall control efficiency of the catalytic oxidizer (MPE-007-CatOx) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

(b) Within 180 days after initial startup, in order to demonstrate compliance with D.3.2, the Permittee shall perform HAP (including emission rate, capture and destruction control efficiency) testing to verify overall control efficiency of the catalytic oxidizer (MPE-007-CatOx) using Method 18 or other methods as approved by the Commissioner, for the HAP contained in the groundwater that has the lowest destruction efficiency, as estimated by

the source and approved by IDEM. This test shall be repeated at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

(c) Testing shall be conducted in accordance with Section C - Performance Testing.

(2) Volatile Organic Compounds (VOC)
In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform an analysis of the inlet vapor concentration of the catalytic oxidizer once per month to determine the total VOC content of the inlet vapor.

(3) Hazardous Air Pollutants (HAPs)
In order to demonstrate compliance with Condition D.3.2, the Permittee shall perform an analysis of the inlet vapor concentration of the catalytic oxidizer once per month to determine the total HAP content of the inlet vapor.

(4) Catalytic Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring the temperature at the inlet to the catalyst bed for the catalytic oxidizer. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average inlet temperature to the catalyst bed of the catalytic oxidizer is below 600°F. A three (3) hour average temperature that is below 600°F is not considered a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall determine the three (3) hour average temperature at the inlet to the catalyst bed of the catalytic oxidizer from the most recent valid performance test that demonstrates compliance with the limits in Condition D.3.1, D.3.2, and D.3.4 as approved by IDEM.

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

(5) Catalytic Oxidizer Inspections
An inspection shall be performed each calendar quarter of the exterior of the catalytic oxidizer and its connections to the Multi-Phase Extraction Remediation Unit looking for signs of physical damage, including corrosion. Any required maintenance indicated by the inspection shall be performed.

(6) Catalyst Replacement
The catalysts used in the catalytic oxidizer shall be replaced within twelve (12) months of start up and at least every twelve (12) months thereafter.

(7) Record Keeping Requirements

(a) To document compliance with Conditions D.3.1, D.3.2, and D.3.4, the Permittee shall maintain records of the continuous inlet temperature to the catalyst bed (reduced to a three (3) hour average basis) for the catalytic oxidizer and the three (3) hour average inlet temperature to the catalyst bed used to demonstrate compliance during the most recent compliant performance test.

(b) To document compliance with Condition D.3.1 and D.3.5, the Permittee shall maintain records of the total VOC content in the inlet vapor concentration of the catalytic oxidizer.

(c) To document compliance with Condition D.3.2 and D.3.6, the Permittee shall maintain records of the total HAP content in the inlet vapor concentration of the catalytic oxidizer.

(d) To document compliance with Condition D.3.8, the Permittee shall maintain records of catalytic oxidizer inspections. These records shall include as a minimum, dates, initials of the person performing the inspection, results, and corrective actions taken (if any are required).

(e) To document compliance with Condition D.3.9, the Permittee shall maintain records of catalyst replacement.

(f) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

These compliance determination and monitoring conditions are necessary because the catalytic oxidizer for the Multi-Phase Extraction Remediation Unit must operate properly to render 326 IAC 2-2 (PSD Minor Limit), 326 IAC 20 (Hazardous Air Pollutants), and 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants) not applicable and to ensure compliance with 326 IAC 2-7 (Part 70).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 163-21721-00018. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(1) Responsible Official (RO)
IDEM, OAQ has determined that it is not necessary to list the Responsible Official name or title in Section A.1, General Information, of the permit. However, OAQ will still be evaluating if a change in RO meets the criteria specified in 326 IAC 2-7-1(34). The revised permit condition is as follows:

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

The Permittee owns and operates stationary source relating to the operation of mixing and blending of paint, varnishes, thinners, and lacquers.

~~Responsible Official:~~	~~Joseph Neidig, V.P. Operations~~
Source Address:	1016 East Columbia Street, Evansville, IN 47711
Mailing Address:	1016 East Columbia Street, Evansville, IN 47711
General Source Phone Number:	(812) 428-9285
SIC Code:	2851
County Location:	Vanderburgh
Source Location Status:	Nonattainment for $PM_{2.5}$ Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

(2) All references to IDEM, OAQ's mailing address have been revised as follows:

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

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

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

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

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

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

(3) Section C – Response to Excursions or Exceedances
The Permittee is required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Condition C.14 - Response to Excursions or Exceedances requires the Permittee to take reasonable response steps to ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Therefore, Condition C.14 for the "Response to Excursions or Exceedances" has been added to Section C and the Table of Contents has been updated.

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

(4) Section A.2 - Emission Units and Pollution Control Equipment Summary has been modified to include the Multi-Phase Extraction Remediation Unit as follows:

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

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

(a) One (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:

(1) two (2) fixed roof dome tanks, identified as TF1-3 and TF1-4, each with a maximum capacity of 4,500 gallons;

(2) two (2) fixed roof dome tanks, identified as TF1-5A and TF1-5B, each with a maximum capacity of 4000 gallons; and

(3) one (1) fixed roof dome tank, identified as TF1-9, each with a maximum capacity of 10,950 gallons.

(b) One (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:

(1) three (3) fixed roof dome tanks, identified as TF2-A1, TF2-A2 and TF2-A3, each with a maximum capacity of 2,610 gallons;

(2) eight (8) fixed roof dome tanks, identified as TF2-B1, TF2-B2, TF2-C1, TF2-C2, TF2-D1, TF2-D2, TF2-E1, and TF2-E2, each with a maximum capacity of 4,040 gallons;

(3) one (1) fixed roof dome tank, identified as TF2-F1, with a maximum capacity of 8,370 gallons;

(4) two (2) fixed roof dome tanks, identified as TF2-F2 and TF2-F3, each with a maximum capacity of 4,180 gallons;

(5) two (2) fixed roof dome tanks, identified as TF2-G and TF2-I each with a maximum capacity of 6,050 gallons;

(6) one (1) fixed roof dome tank, identified as TF2-H, with a maximum capacity of 6,000 gallons; and

(7) one (1) fixed roof dome tank, identified as TF2-J, with a maximum capacity of 1,500 gallons.

(c) One (1) solvent tank farm, identified as tank farm # 4, installed in 1980, exhausting to the atmosphere, and consisting of:

(1) three (3) fixed roof dome tanks, identified as TF4-R1, TF4-R2 and TF4-R3, each with a maximum capacity of 2,300 gallons; and

(2) four (4) fixed roof dome tanks, identified as TF4-A, TF4-B, TF4-C and TF4-D, each with a maximum capacity of 2,300 gallons.

(d) One (1) solvent tank farm, identified as tank farm # 3, installed in 1980, exhausting to the atmosphere, and consisting of:

(1) one (1) fixed roof dome tank, identified as TF3-S1, with a maximum capacity of 3,500 gallons; and

(2) two (2) fixed roof dome tanks, identified as TF3-S2 and TF3-S3, each with a maximum capacity of 2,000 gallons.

(e) Paint Production operation with maximum production capacity of 2,000,000 gallons per year and consisting of the following:

(1) One (1) blending operation, identified as UV/VM production building # 1, installed in the 1930's, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of various mixing stations with capacities ranging from 700 to 3000 gallons, equipment test drops, and fourteen (14) general exhaust ducts.

(2) One (1) blending operation, identified as lacquer production building # 2, installed in 1963, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of various mixing stations with capacities ranging from 500 to 1,221 gallons, five (5) general exhaust ducts, and four (4) manhole exhaust vents.

(3) One (1) production operation, identified as main production building # 3, installed in 1967, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of various mixing stations with capacities ranging from 700 to 2500 gallons, milling units, bucket filling machines, tote cleaning units, metal dust collector, tote washing units, twenty (20) general exhaust ducts, and eight (8) manhole exhaust vents.

(4) Various portable mix tanks and totes with capacities ranging from 6 to 605 gallons.

(5) One (1) waste processing facility, identified as building # 8, installed in 1967, consisting of 5 general exhaust ducts, and exhausting to stack SV8-1.

(6) One (1) mixing operation, in building # 14, installed in 1967, exhausting to stack SV14-8, and consisting of various mixing stations with capacity of 700 gallons and three (3) general exhaust ducts.

(f) One (1) dry material handling operation with maximum capacity of 157 lb/hr, exhausting through one (1) stack.

(g) One (1) Multi-Phase Extraction Remediation Unit, approved for construction in 2007, identified as MPE-07, with a design flow rate of 200 cfm, using a catalytic oxidizer (MPE-07-CatOx) rated at 150,000 BTU/hr as control, and exhausting to stack MPE-S1, consisting of:

(1) One (1) PD Blower Pump Package;

(2) Miscellaneous Influent Manifolds;

(3) One (1) Air/Water Separator Vessel;

(4) One (1) Air/Free Product Separator Vessel;

(5) Miscellaneous Transfer Pumps;

(6) One (1) Oil/Water Separator;

(7) One (1) Effluent Surge Tank; and

(8) One (1) Air Tray Stripper.

(5) The VOC and HAP limits in Condition D.1.1 - Volatile Organic Compounds and Condition D.1.2 - Hazardous Air Pollutants have been modified to account for the VOC and HAP emissions associated with the new Multi-Phase Extraction Remediation Unit as shown below.

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

(a) The input of VOC to the paint production operations shall be limited such that the potential to emit (PTE) of VOC shall be less than ~~249~~ **247** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used.

Compliance with the VOC mass input and VOC loss rate **in conjunction with the VOC emission limits in Condition D.3.1** shall limit the source-wide VOC emissions to less than 250 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-2 (PSD) ~~do not apply~~ **are rendered not applicable**.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

(a) The input of any single HAP to the paint production operations shall be limited such that the potential to emit (PTE) of any single HAP shall be less than ~~9.9~~ **9.4** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The input of total HAPs to the paint production operations shall be limited such that the potential to emit (PTE) of total HAPs shall be less than ~~24.9~~ **24.4** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The HAP loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used.

(d) The Permittee shall not produce any varnish that is considered a bodying oil, oleo resinous material, or alkyd without prior IDEM, OAQ approval.

Compliance with above conditions **in conjunction with the single and combined HAP emission limits in Condition D.3.2** shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 20 and 40 CFR 63 (NESHAP, Subpart HHHHH) ~~do not apply~~ **are rendered not applicable**.

(6) Section D.3 has been added for emission units involved in the groundwater remediation process. The insignificant activities, previously included in Section D.3, have been moved to Section D.4.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(g) One (1) Multi-Phase Extraction Remediation Unit, approved for construction in 2007, identified as MPE-07, with a design flow rate of 200 cfm, using a catalytic oxidizer (MPE-07-CatOx) rated at 150,000 BTU/hr as control, and exhausting to stack MPE-S1, consisting of:
(1) One (1) PD Blower Pump Package;
(2) Miscellaneous Influent Manifolds;
(3) One (1) Air/Water Separator Vessel;
(4) One (1) Air/Free Product Separator Vessel;
(5) Miscellaneous Transfer Pumps;
(6) One (1) Oil/Water Separator;
(7) One (1) Effluent Surge Tank; and
(8) One (1) Air Tray Stripper.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

(a) Whenever the Multi-Phase Extraction Remediation Unit is in operation, the exhaust from the Multi-Phase Extraction Remediation Unit shall be vented through the catalytic oxidizer MPE-07-Catox. The catalytic oxidizer shall have a minimum overall control efficiency of 95%.

(b) The maximum total VOC inlet vapor concentration of the catalytic oxidizer shall not exceed 12,190 mg/m^3.

(c) The VOC emissions from the catalytic oxidizer shall not exceed 0.46 pound per hour.

Compliance with these limits in conjunction with the VOC limits in Condition D.1.1 shall limit the source-wide VOC emissions to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (PSD) are rendered not applicable.

D.3.2 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

(a) Whenever the Multi-Phase Extraction Remediation Unit is in operation, the exhaust from the Multi-Phase Extraction Remediation Unit shall be vented through the catalytic oxidizer MPE-07-CatOx. The catalytic oxidizer shall have a minimum single HAP overall control efficiency of 95%.

(b) Whenever the Multi-Phase Extraction Remediation Unit is in operation, the exhaust from the Multi-Phase Extraction Remediation Unit shall be vented through the catalytic oxidizer MPE-07-CatOx. The catalytic oxidizer shall have a minimum combined HAP overall control efficiency of 95%.

(c) The maximum single and total HAP inlet vapor concentration of the catalytic oxidizer shall not exceed 2,438 mg/m^3.

(d) The single and total HAPs emissions from the catalytic oxidizer shall not exceed 0.09 pound per hour.

Compliance with these limits in conjunction with the single and combination HAP limits in Condition D.1.2 shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 20 and 40 CFR 63 (NESHAP, Subpart HHHHH) are rendered not applicable.

D.3.3 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for the Multi-Phase Extraction Remediation Unit and its emission control device.

Compliance Determination Requirements

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

(a) Within 180 days after initial startup, in order to demonstrate compliance with D.3.1, the Permittee shall perform VOC (including emission rate, capture and destruction efficiency) testing of the catalytic oxidizer (MPE-007-CatOx) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

(b) Within 180 days after initial startup, in order to demonstrate compliance with D.3.2, the Permittee shall perform HAP (including emission rate, capture and destruction control efficiency) testing of the catalytic oxidizer (MPE-007-CatOx) using Method 18 or other methods as approved by the Commissioner, for the HAP contained in the groundwater that has the lowest destruction efficiency, as estimated by the source and approved by IDEM. This test shall be repeated at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

(c) Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform an analysis of the inlet vapor concentration of the catalytic oxidizer once per month to determine the total VOC content of the inlet vapor.

D.3.6 Hazardous Air Pollutants (HAPs)

In order to demonstrate compliance with Condition D.3.2, the Permittee shall perform an analysis of the inlet vapor concentration of the catalytic oxidizer once per month to determine the total HAP content of the inlet vapor.

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

D.3.7 Catalytic Oxidizer Temperature [326 IAC 2-7-5(3)]

(a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring the temperature at the inlet to the catalyst bed for the catalytic oxidizer. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved performance test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average inlet temperature to the catalyst bed of the catalytic oxidizer is below 600°F. A three (3) hour average temperature that is below 600°F is not considered a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall determine the three (3) hour average temperature at the inlet to the catalyst bed of the catalytic oxidizer from the most recent valid performance test that demonstrates compliance with the limits in Condition D.3.1, D.3.2, and D.3.4 as approved by IDEM.

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

D.3.8 Catalytic Oxidizer Inspections

An inspection shall be performed each calendar quarter of the exterior of the catalytic oxidizer and its connections to the Multi-Phase Extraction Remediation Unit looking for signs of physical damage, including corrosion. Any required maintenance indicated by the inspection shall be performed.

D.3.9 Catalyst Replacement

The catalysts used in the catalytic oxidizer shall be replaced within twelve (12) months of start up and at least every twelve (12) months thereafter.

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

D.3.10 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1, D.3.2, and D.3.4, the Permittee shall maintain records of the continuous inlet temperature to the catalyst bed (reduced to a three (3) hour average basis) for the catalytic oxidizer and the three (3) hour average inlet temperature to the catalyst bed used to demonstrate compliance during the most recent compliant performance test.

(b) To document compliance with Condition D.3.1 and D.3.5, the Permittee shall maintain records of the total VOC content in the inlet vapor concentration of the catalytic oxidizer.

(c) To document compliance with Condition D.3.2 and D.3.6, the Permittee shall maintain records of the total HAP content in the inlet vapor concentration of the catalytic oxidizer.

(d) To document compliance with Condition D.3.8, the Permittee shall maintain records of catalytic oxidizer inspections. These records shall include as a minimum, dates, initials of the person performing the inspection, results, and corrective actions taken (if any are required).

(e) To document compliance with Condition D.3.9, the Permittee shall maintain records of catalyst replacement.

(f) All records shall be maintained in accordance with the Part 70 Section C - General Record Keeping Requirements.

(6) The following report forms have been updated to reflect changes in emission limits due to the addition of the Multi-Phase Extraction Remediation Unit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
AND EVANSVILLE EPA

Part 70 Quarterly Report

Source Name: Red Spot Paint and Varnish Co., Inc.
Source Address: 1016 East Columbia Street, Evansville, IN 47711
Mailing Address: 1016 East Columbia Street, Evansville, IN 47711
Part 70 Permit No.: T163-21721-00018
Facility: Paint Production Operation
Parameter: Total VOC emissions
Limit: VOC emissions shall be limited to less than ~~249~~ **247** tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times C_i \times 0.015$$

where:
E = VOC emissions in pounds
i = Single component
U = VOC input
C = VOC content
0.015 lb/lb = VOC loss rate

YEAR:_____

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

☐ No deviation occurred in this month.
☐ Deviation/s occurred in this month.
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
AND EVANSVILLE EPA

Part 70 Quarterly Report

Source Name: Red Spot Paint and Varnish Co., Inc.
Source Address: 1016 East Columbia Street, Evansville, IN 47711
Mailing Address: 1016 East Columbia Street, Evansville, IN 47711
Part 70 Permit No.: T163-21721-00018
Facility: Paint Production Operation
Limit: Single HAP and total HAPs emissions shall be limited to less than ~~9.9~~ **9.4** and ~~24.9~~ **24.4** tons per twelve (12) consecutive month period, respectively, based on the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times C_i \times 0.015$$

where:
E = Worst case single HAP/total HAPs emissions in pounds
i = Single component
U = HAP input
C = HAP content
0.015 lb/lb = HAP loss rate

YEAR:_____

Month	Total For This Month (tons)		Total For Previous 11 Months (tons)		Total For 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

☐ No deviation occurred in this month.
☐ Deviation/s occurred in this month.
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 and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 163-24751-00018 and Significant

Permit Modification No. 163-24762-00018. The staff recommend to the Commissioner that this Part 70 Minor Source and Significant Permit Modification be approved.

Appendix A: Emission Calculations
VOC Emission-Discharge Estimates - Multi-Phase Extraction
Without Treatment

Company Name: Red Spot Paint and Varnish Co., Inc.
Address City, IN Zip: 1016 East Columbia St., Evansville, IN 47711
Source Modification Number: 163-24751-00018
Permit Modification Number: 163-24762-00018
Plant ID: 163-00018
Reviewer: Kristen Layton
Date: May 9, 2007

Vapor (Maximum Observed Concentrations)				
Acetone	7.9	mg/m^3	0.0079	mg/l
Benzene	11	mg/m^3	0.011	mg/l
MEK	51	mg/m^3	0.051	mg/l
sec-Butylbenzene	41	mg/m^3	0.041	mg/l
Carbon disulfide	0.97	mg/m^3	0.00097	mg/l
Cumene	110	mg/m^3	0.11	mg/l
Cyclohexane	7	mg/m^3	0.007	mg/l
p-Cymene	18	mg/m^3	0.018	mg/l
Ethanol	2400	mg/m^3	2.4	mg/l
Ethlybenzene	200	mg/m^3	0.2	mg/l
4-Ethyltoluene	1000	mg/m^3	1	mg/l
Heptane	22	mg/m^3	0.022	mg/l
Hexane	7.2	mg/m^3	0.0072	mg/l
4-Methyl-2-pentanone	29	mg/m^3	0.029	mg/l
2-Propanol	160	mg/m^3	0.16	mg/l
Propylbenzene	280	mg/m^3	0.28	mg/l
Toluene	32	mg/m^3	0.032	mg/l
1,2,4-TMB	680	mg/m^3	0.68	mg/l
1,3,5-TMB	380	mg/m^3	0.38	mg/l
2,2,4-Trimethylpentane	9.3	mg/m^3	0.0093	mg/l
m,p-Xylenes	590	mg/m^3	0.59	mg/l
o-Xylenes	230	mg/m^3	0.23	mg/l
Total VOC	6266.37	mg/m^3	6.27	mg/l

6266.37 mg/m^3
0.013802577 lbs/m^3
0.000390897 lbs/ft^3
MPE System Design Flow Rate
200 cfm
0.078179423 lbs/min
112.5783688 lbs/day
41091.10462 lbs/yr

Total VOC Emissions 20.55 tons/yr

CATOX - 95% Control Efficiency 1.0275 tons/yr

Note: Concentrations are based on the January 2006 Pilot MPE Event results.

Appendix A: Emission Calculations
HAP Emission-Discharge Estimates - Multi-Phase Extraction
Without Treatment

Company Name: Red Spot Paint and Varnish Co., Inc.
Address City, IN Zip: 1016 East Columbia St., Evansville, IN 47711
Source Modification Number: 163-24751-00018
Permit Modification Number: 163-24762-00018
Plant ID: 163-00018
Reviewer: Kristen Layton
Date: May 9, 2007

HAPS	Max. Vapor Concentration	Ave. Vapor Concentration	Design Vapor Concentration	Units
Benzene	11	5.8	5.8	mg/m^3
Carbon Disulfide	0.97	0.97	0.97	mg/m^3
Cumene	110	66.8	66.8	mg/m^3
Ethylbenzene	200	133.3	133.3	mg/m^3
Hexane	7.2	3.7	3.7	mg/m^3
Toluene	32	14.3	14.3	mg/m^3
2,2,4-trimethylpentane	9.3	4.6	4.6	mg/m^3
m,p-Xylenes	590	371.3	371.3	mg/m^3
o-Xylenes	230	135.3	135.3	mg/m^3
Total HAPs	1190.47	736.07	736.07	mg/m^3
	1.2	0.7	0.7	mg/l
	0.002622181	0.0016213	0.0016213	lbs/m^3
	7.42617E-05	4.59162E-05	4.59162E-05	lbs/ft^3
	Limited Flow Rate	Ave. Observed Flow For a Single Well	MPE System Design Flow Rate	
	200	13	300	cfm
	0.01485234	0.00059691	0.013774848	lbs/min
	21.38736952	0.859550489	19.83578051	lbs/day
	7806.389873	313.7359283	7240.059885	lbs/yr
HAP Emissions	3.9	0.16	3.62	tons/yr
Estimated HAP Emissions	3.9	0.16	3.62	tons/yr
CATOX - 95% Control Efficiency	0.195	tons/yr		

Note: Concentrations are based on the January 2006 Pilot MPE Event results.

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

Company Name: Red Spot Paint and Varnish Co., Inc.
Address City IN Zip: 1016 East Columbia St., Evansville, IN 47711
Permit Number: 163-24751-00018
Plt ID: 163-00018
Reviewer: Kristen Layton
Date: May 9, 2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.15	1.3

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	Negligible	Negligible	Negligible	0.1	Negligible	0.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Red Spot Paint and Varnish Co., Inc.
Address City IN Zip: 1016 East Columbia St., Evansville, IN 47711
Permit Number: 163-24751-00018
Plt ID: 163-00018
Reviewer: Kristen Layton
Date: May 9, 2007

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.380E-06	7.884E-07	4.928E-05	1.183E-03	2.234E-06

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.285E-07	7.227E-07	9.198E-07	2.497E-07	1.380E-06

Methodology is the same as page 3.

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

Appendix A: Emission Calculations
Calculation Summery - Multi-Phase Extraction
Without Treatment

Company Name: Red Spot Paint and Varnish Co., Inc.
Address City, IN Zip: 1016 East Columbia St., Evansville, IN 47711
Source Modification Number: 163-24751-00018
Permit Modification Number: 163-24762-00018
Plant ID: 163-00018
Reviewer: Kristen Layton
Date: May 9, 2007

	NO_x	SO2	CO	PM	PM10	VOC	HAP
Before Controls							
Multi-Phase Extraction (tons/yr)	0.1	Negligible	0.1	Negligible	Negligible	20.55	3.9
After Controls							
Multi-Phase Extraction (tons/yr)	0.1	Negligible	0.1	Negligible	Negligible	1.03	0.2