



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: December 10, 2007
RE: EIS Fiber Coating, Inc./ 017-25075-00039
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, 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.dot12/03/07



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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

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

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

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

Operation Permit No.: F017-25075-00039	
Issued by/Original Signed By:	Issuance Date: December 10, 2007
	Expiration Date: December 10, 2012
Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	

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SECTION A SOURCE SUMMARY

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

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

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

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

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

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

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

method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.

- (f) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (g) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (h) One (1) flock adhesive application line without primer usage, identified as L4, approved for construction in 2007, with a maximum flock adhesive usage of 1.0 gallon per hour, using either drip and wipe application method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stack L4. This application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.

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

This stationary source also includes the following insignificant activities:

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F017-25075-00039, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

-
- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;
- Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

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

- (a) All terms and conditions of permits established prior to F017-25075-00039 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The

notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the

likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (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 2-8-4][326 IAC 2-8-5]

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

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

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

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

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Five (5) flock adhesive application lines with primer usage, identified as L1, EL1, EL2, 3B2, and BL, constructed in 1984, 1988, 1996, 1988, and 1987, respectively, each with a maximum primer usage of 0.04 gallons per hour and a maximum flock adhesive usage of 0.71 gallons per hour, using either drip and wipe application method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L1, EL1, EL2, 3B2, and BL, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.
- (b) Two (2) flock adhesive application lines without primer usage, identified as L2 and L3, constructed in 1987, each with a maximum flock adhesive usage of 0.86 gallons per hour, using either drip and wipe application method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L2 and L3, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.
- (c) One (1) flock adhesive application line, identified as Nisco Line, constructed in 2002, with a maximum flock adhesive usage of 0.06 gallons per hour, using either drip and wipe application method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco. The line is also equipped with a flocking booth, which is controlled by a baghouse that vents inside the building.
- (d) One (1) flock adhesive application line, identified as Lock Knob Line, constructed in 1987, with a maximum flock adhesive usage of 0.25 gallons per hour, using either drip and wipe application method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.
- (e) One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line, constructed in 1989, with a maximum primer usage of 0.75 gallons per hour, and flock adhesive usage of 1.5 gallons per hour, using drip and wipe application method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.
- (f) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (g) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (h) One (1) flock adhesive application line without primer usage, identified as L4, approved for construction in 2007, with a maximum flock adhesive usage of 1.0 gallon per hour, using either drip and wipe application method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stack L4. This application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.

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

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

D.1.1 FESOP Limits and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the Permittee shall limit emissions as follows:

- (a) The total VOC input to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 plus the amount of VOC used for clean-up shall be limited to less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total single HAP input to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 plus the amount of any single HAP used for clean-up shall be limited to less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total input of any combination of HAPs to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 plus the amount of any combination of HAPs used for clean-up shall be limited to less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) Emissions of PM10 from the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 shall each be limited to less than 0.551 pounds per hour.

Combined with the emissions from insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year, the PM10 emissions from the entire source are limited to less than 100 tons per year, and the HAP emissions from the entire source are limited to less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. Compliance with these limits renders 326 IAC 2-2 Prevention of Significant Deterioration (PSD), 326 IAC 2-4.1 (MACT), and 326 IAC 2-7 not applicable.

D.1.2 PSD Minor Limits [326 IAC 2-2]

In order to render 326 IAC 2-2 Prevention of Significant Deterioration not applicable, the Permittee shall limit emissions as follows:

Emissions of PM from the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 shall each be limited to less than 0.551 pounds per hour.

D.1.3 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the adhesive application/surface coating processes at the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Lock Knob Line, and Overhead Conveyor Line shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the flocking operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 shall each be limited to less than 0.551 pounds per hour when operating at a process weight rate less than one hundred (100) pounds per hour.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to Minor Permit Revision No. 017-18432-00039, issued on April 24, 2004, total input of VOC to the Overhead Conveyor Line, including all cleanup solvents, shall be limited to less than twenty-four (24) tons per twelve (12) consecutive month period, with

compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.

- (b) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, the total VOC input to graphics line GL1 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.
- (c) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, the total VOC input to graphics line GL2 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.

D.1.5 VOC Emissions [326 IAC 2-8-11.1]

- (a) Pursuant to Minor Permit Revision No. 017-18432-00039, issued on April 24, 2004, the total VOC input to the Nisco Line, Lock Knob Line, and Overhead Conveyor Line (including primer and adhesive application) shall be limited to less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable to this modification.
- (b) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, the total VOC input to the graphics lines GL1 and GL2 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision), 326 IAC 8-1-6 (BACT), and 326 IAC 2-2 (PSD) not applicable to this modification.
- (c) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, and as revised in this FESOP Renewal, the PM and PM10 emissions from the flocking operations on each of the graphics lines GL1 and GL2 shall each be limited to less than 0.551 pounds per hour and the particulate emissions shall be controlled with a baghouse having an overall particulate control efficiency of at least 99% and complying with a no visible emission (0% opacity) standard. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable to this modification.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Particulate Control

In order to comply with the requirements of Conditions D.1.1(d), D.1.2, D.1.3(b), and D.1.5(c) the baghouses that control particulate emissions from the flocking operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 shall be in operation at all times that these facilities are in operation.

D.1.8 Volatile Organic Compounds and Hazardous Air Pollutants [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1, D.1.4, and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24

in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks L1, EL1, EL2, 3B2, BL, L2, L3, L4, LK, OH-1, and OH-2 while one or more of the booths are in operation. Section C - Response to Excursions and Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions and Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Section C - Response to Excursions and Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1, D.1.4, and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage and emission limits established in Conditions D.1.1, D.1.4, and D.1.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month;
 - (4) The total single HAP usage for each month;
 - (5) The total combination HAPs usage for each month; and
 - (6) The weight of VOCs, single HAP, and a combination of HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.4, and D.1.5 shall be submitted to the address listed in Section C - General Reporting

Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) One (1) hot water boiler, with a maximum heat input of 0.15 MMBtu/hr.

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

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

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

Pursuant to 326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating), the particulate emissions from the 0.15 MMBtu per hour boiler shall be limited to less than 0.6 pounds per MMBtu.

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

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

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-25075-00039

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-25075-00039

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-25075-00039
Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2
Parameter: VOC, including cleanup solvent
Limit: Less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(a)]

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
 Source Address: 616 East Main Street, Logansport, Indiana 46947
 Mailing Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP Permit No.: F017-25075-00039
 Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2
 Parameter: Single HAP, including single HAP in cleanup solvent
 Limit: Less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(b)]

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-25075-00039
Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2
Parameter: Combination HAPs, including HAPs in cleanup solvent
Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(c)]

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-25075-00039
Facility: Nisco Line, Lock Knob Line, and Overhead Conveyor Line (including primer and adhesive application)
Parameter: Total VOC usage, including cleanup solvent
Limit: Less than 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Conditions D.1.4(a) and D.1.5(a)]

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-25075-00039
Facility: GL1 and GL2
Parameter: Total VOC usage, including cleanup solvent
Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Conditions D.1.4(b), D.1.4(c), and D.1.5(b)]

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Source Name: EIS Fibercoating, Inc.
 Source Address: 616 East Main Street, Logansport, Indiana 46947
 Mailing Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP Permit No.: F017-25075-00039

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name:	EIS Fibercoating, Inc.
Source Location:	616 E. Main Street, Logansport, Indiana 46947
County:	Cass
SIC Code:	3069 and 3089
Operation Permit No.:	F017-15789-00039
Operation Permit Issuance Date:	January 8, 2003
FESOP Renewal No.:	017-25075-00039
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from EIS Fibercoating, Inc. relating to the operation of a stationary rubber extrusion and coating plant.

History

On April 26, 2007, EIS Fibercoating, Inc. submitted an application to the OAQ requesting to renew its operating permit. EIS Fibercoating, Inc. was issued a Federally Enforceable State Operating Permit on January 8, 2003.

Permitted Emission Units and Pollution Control Equipment

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

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

particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.

- (e) One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line, constructed in 1989, with a maximum primer usage of 0.75 gallons per hour, and flock adhesive usage of 1.5 gallons per hour, using drip and wipe application methods or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse that vents inside the building.
- (f) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, approved for construction in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL1, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.
- (g) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, approved for construction in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using flow coating methods for adhesive application, using dry filters for control of particulates, venting through stack GL2, equipped with a flocking operation, with particulate emissions from flocking controlled by a baghouse that vents inside the building.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The renewal application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (h) One (1) flock adhesive application line without primer usage, identified as L4, approved for construction in 2007, with a maximum flock adhesive usage of 1.0 gallon per hour, using either drip and wipe application method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stack L4. This application line is equipped with a flocking operation, which is controlled by a baghouse that vents inside the building.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) One (1) hot water boiler, with a maximum heat input of 0.15 MMBtu/hr.
 - (2) One (1) furnace, with a maximum heat input of 0.15 MMBtu/hr.
 - (3) One (1) furnace, with a maximum heat input of 0.4 MMBtu/hr.
 - (4) Three (3) space heaters, each with a maximum heat input of 0.15 MMBtu/hr.
 - (5) One (1) space heater, with a maximum heat input of 0.4 MMBtu/hr.
 - (6) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.
 - (7) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.

- (8) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.
- (b) Electric infrared cure equipment.
- (c) Paved and unpaved roads and parking lots with public access.

Existing Approvals

Since the issuance of the Federally Enforceable State Operating Permit F017-15789-00039 on January 8, 2003, the source has constructed or has been operating under the following additional approvals:

- (a) First Minor Permit Revision No. 017-18432-00039, issued on April 24, 2004;
- (b) Administrative Amendment No. 017-18929-00039, issued on April 30, 2004; and
- (c) Second Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

- (a) Conditions D.1.1(d), D.1.2(a), D.1.4, and D.1.12(b) from FESOP 017-15789-00039 have been removed because the rubber extrusion lines to which these conditions applied was not installed.
- (b) The limits on VOC and a combination of HAPs in Conditions D.1.1(a) and D.1.1(c) from FESOP 017-15789-00039 have been revised because the rubber extrusion lines were not installed.
- (c) Condition D.1.2(a) from FESOP 017-15789-00039 required prior approval from IDEM for changes in VOC usage on the flock adhesive application lines that would increase the potential to emit of VOC to 25 tons per year or greater. This condition has been removed because this requirement is contained in Section B of the permit.
- (d) Condition D.1.3 from FESOP 017-15789-00039 has been revised to reflect current particulate control requirements for surface coating operations.
- (e) Conditions D.1.5, D.1.8, D.1.9, D.1.10, D.1.11, and D.1.12(c),(d), and (e) required that the source perform compliance monitoring on the particulate control devices for the flocking operations. These conditions have been removed because these operations have a very low potential to emit of particulate and monitoring is not required to determine compliance with the particulate control requirements.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

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

County Attainment Status

The source is located in Cass County.

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

- (a) Cass County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Cass County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	263
PM10	263
SO ₂	0.01
VOC	572
CO	0.94
NO _x	1.12
Single HAP (xylene)	38.2
Total HAPs	103

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source will limit its PM10 and VOC emissions to less than Title V levels. Therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source will limit its single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.
- (d) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Unrestricted Potential to Emit of Emission Unit (Line 4) to Be Added in this Renewal

The source has proposed adding a new flocking line (L4) in this permit renewal. This flocking line is incorporated into this permit pursuant to 326 IAC 2-8-10(a)(14) because this modification adds a emissions unit of the same type that are already permitted and will comply with the same requirements and permit terms and conditions as the existing emissions units and the increase in potential to emit is less than the thresholds in 326 IAC 2-2 and 326 IAC 2-3. The table below summarizes the potential to emit, reflecting all limits of the emission unit. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
L4	17.3	17.3	0	3.91	0	0	3.42
Total Emissions	17.3	17.3	0	3.91	0	0	3.42

Potential to Emit After Issuance

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

Process/emission unit	Potential To Emit (tons/year)						HAPs
	PM	PM10	SO ₂	VOC	CO	NO _x	
L1, EL1, EL2, 3B2, and BL	16.7	16.7	0	Less than 99	0	0	Single: Less than 9.9 Combination: Less than 24.9
L2 and L3	6.19	6.19	0		0	0	
Nisco, Lock Knob and Overhead Conveyor	8.89	8.89	0		0	0	
GL1 and GL2	4.82	4.82	0		0	0	
L4	2.41	2.41	0		0	0	
Combustion	0.02	0.08	0.01	0.06	0.94	1.12	0.02
Total Emissions	39.0	39.1	0.01	Less than 100	0.94	1.12	Single: Less than 10.0 Combination: Less than 25.0

Note: the PM emissions from the flock adhesive application lines and graphics lines represents allowable emissions under 326 IAC 6-3-2. PM10 emissions from the flock adhesive application lines and graphics lines represents allowable emissions under 326 IAC 2-2.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are limited by federally enforceable conditions in the permit to less than two hundred fifty (250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc, 326 IAC 12) are not included in this permit because the 0.15 MMBtu per hour boiler has a maximum heat input capacity less than 10 MMBtu per hour.
- (c) The requirements of the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR 60, Subpart EE, 326 IAC 12) are not included in this permit because the source does not apply surface coatings to metal furniture.
- (d) The requirements of the New Source Performance Standards for Metal Coil Surface Coating (40 CFR 60, Subpart TT, 326 IAC 12) are not included in this permit because this source does not perform metal coil surface coating.
- (e) The requirements of the New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR 60, Subpart TTT, 326 IAC 12) are not included in this permit because this source does not apply the surface coating to any business machines.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 61) included in this permit renewal for this source. This source is not one of the types of operations subject to 40 CFR 61.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 20, and 40 CFR Part 63) included in this permit renewal for this source.

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP, 326 IAC 20) are not included in this permit because this source has taken federally enforceable limits on emissions of hazardous air pollutants (HAPs) such that this source is an area source under Section 112 of the Clean Air Act.

State Rule Applicability - Entire Source

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

- (a) The FESOP conditions in this permit limit emissions of PM 10 and VOC to less than 100 tons per year.
- (b) The following condition has been added to the permit to limit emissions of PM to less than major source levels:

Emissions of PM from the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 shall each be limited to less than 0.551 pounds per hour.

This existing stationary source is not major for PSD because the emissions of each criteria pollutant are limited to less than two hundred fifty (250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8 (FESOP)

The potential to emit of VOC and PM10 from the entire source is greater than 100 tons per year and the potential to emit of HAP from the entire source is greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for any combination of HAPs.

Pursuant to 326 IAC 2-8-4, the following restrictions are necessary:

- (a) The total amount of VOC delivered to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 plus the amount of VOC used for clean-up shall be limited to less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the VOC emissions from the other emissions units at this source, source-wide VOC emissions are limited to less than one hundred (100) tons per year.
- (b) The total amount of any single HAP delivered to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 plus the amount of any single HAP used for clean-up shall be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total amount of any combination of HAPs delivered to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 plus the amount of any combination of HAPs used for clean-up shall not exceed twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (d) Emissions of PM10 from the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 shall each be limited to less than 0.551 pounds per hour.

Combined with the emissions from insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year, the PM10 emissions from the entire source are limited to less than 100 tons per year, and the HAP emissions from the entire source are limited to less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. The limit on PM10 emissions effectively limits emissions of PM to less than major source levels. Therefore, the requirements of 326 IAC 2-2 Prevention of Significant Deterioration (PSD), 326 IAC 2-4.1 (MACT), and 326 IAC 2-7 are not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

The source is subject to 326 IAC 6-4 (Fugitive Dust Emissions) because the source maintains paved and unpaved roads and parking lots with public access. Pursuant to 326 IAC 6-4, the Permittee shall not generate fugitive dust to the extent that some portion of the material escapes 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.

State Rule Applicability – Surface Coating Facilities

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

- (a) The operation of the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, GL1, and GL2 each have the potential to emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to these facilities.
- (b) The operation of the facilities identified as Overhead Conveyor Line will emit greater than ten (10) tons per year of a single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source-wide HAPs emissions are limited by conditions in the permit to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

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

The following requirements are carried forward from First Minor Permit Revision No. 017-18432-00039, issued on April 24, 2004 and Second Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007:

- (a) Pursuant to Minor Permit Revision No. 017-18432-00039, issued on April 24, 2004, the total VOC input to the Nisco Line, Lock Knob Line, and Overhead Conveyor Line (including primer and adhesive application) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of

each month. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable to this modification.

- (b) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, the total VOC usage in the graphics lines GL1 and GL2 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision), 326 IAC 8-1-6 (BACT), and 326 IAC 2-2 (PSD) not applicable to this modification.
- (c) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, and as revised in this FESOP Renewal, the PM and PM10 emissions from the flocking operations on each of the graphics lines GL1 and GL2 shall each be limited to less than 0.551 pounds per hour and the particulate emissions shall be controlled with a baghouse having an overall particulate control efficiency of at least 99% and complying with a no visible emission (0% opacity) standard. Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable to this modification.

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

- (a) The adhesive application/surface coating processes on the Nisco Line uses less than five (5) gallons of flock adhesive each day. Pursuant to 326 IAC 6-3-2(b)(15), the requirements of 326 IAC 6-3-2 do not apply.
- (b) The coatings applied in the adhesive application/surface coating processes at the facilities identified as GL1 and GL2 are applied with a screen printing process, that is similar to surface coating using flow coating or brush coating. This process does not result in the formation of airborne particulate. Pursuant to 326 IAC 6-3-2(b)(7), the adhesive application processes on graphics lines GL1 and GL2 are exempt from the requirements of 326 IAC 6-3-2.
- (c) Pursuant to 326 IAC 6-3-2(d), particulate from the adhesive application/surface coating processes at the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Lock Knob Line, and Overhead Conveyor Line shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (d) The flocking operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 each have a process weight rate less than one hundred (100) pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the flocking operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 shall each be limited to less than 0.551 pounds per hour when operating at a process weight rate less than one hundred (100) pounds per hour. The baghouses that control particulate emissions from these operations shall be in operation at all times that these facilities are in operation, in order to comply with this limit.

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

- (a) The potential to emit VOC from each of the flock adhesive application lines identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, and Lock Knob Line is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (b) The potential to emit VOC from the flock adhesive application line identified as Overhead Conveyor Line is greater than twenty-five (25) tons per year. The Permittee accepted the following limit on the usage of VOC at this facility:

Pursuant to Minor Permit Revision No. 017-18432-00039, issued on April 24, 2004, usage of VOC at the Overhead Conveyor Line, including all cleanup solvents, shall be limited to less than twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.

- (c) The graphics line identified as GL1 has a potential to emit of VOC greater than twenty-five (25) tons per year. The Permittee accepted the following limit on usage of VOC at graphics line GL1:

Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, the VOC usage in graphics line GL1 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.

- (d) The graphics line identified as GL2 has a potential to emit of VOC greater than twenty-five (25) tons per year. The Permittee accepted the following limit on usage of VOC at graphics line GL2:

Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, the VOC usage in graphics line GL2 shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the requirements of 326 IAC 8-1-6 (BACT) not applicable.

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

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

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

This source applies adhesive and primers to rubber and plastic automotive parts only. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

State Rule Applicability – Boiler

326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

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

Where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

The emission rate limit calculated from the equation above equals:

$$Pt = \frac{1.09}{(0.15)^{0.26}} = 1.79 \text{ lbs/MMBtu}$$

However, 326 IAC 6-2-4(a) also states that if Q is less than 10 MMBtu/hr, Pt shall not exceed 0.6. Therefore, the PM emission limit for the 0.15 MMBtu/hr boiler is 0.6 lbs/MMBtu.

Compliance Determination and Monitoring Requirements

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

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

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

The baghouses that control particulate emissions from the flocking operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, Nisco Line, Lock Knob Line, Overhead Conveyor Line, GL1, and GL2 shall be in operation at all times that these facilities are in operation.

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

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks L1, EL1, EL2, 3B2, BL, L2, L3, L4, LK, OH-1, and OH-2 while one or more of the booths are in operation. Section C - Response to Excursions and Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions and Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Section C - Response to Excursions and Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

There are no compliance monitoring requirements applicable to flocking operations at this source. The allowable emissions for controlled pollutants (PM and PM10) are small and do not require compliance monitoring to meet the emission standards in the permit. The baghouses for control of particulate from the flocking operations exhaust inside the building. IDEM does not require visible emissions notations for particulate sources that exhaust indoors and whose vents cannot be re-directed outdoors.

There are no testing requirements for the facilities at this source. The Permittee is required to keep records of the amount of VOC and HAP used in the flock adhesive application lines.

Recommendation

The staff recommends to the Commissioner that the Federally Enforceable State Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on April 26, 2007.

Conclusion

The operation of this stationary rubber extrusion and coating plant shall be subject to the conditions of the attached FESOP Renewal No. 017-25075-00039.

Appendix A: Emission Calculations
VOC and Particulate Emissions from L1, EL1, EL2, 3B2, and BL

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

1. VOC and PM/PM10 emissions from the coating operations (worst case scenario):

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr/line)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls		
											PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
Primer	7.28	96.4%	0.0%	96.4%	0.04	7.02	0.28	6.74	1.23	65%	3.67E-03	0.02	80%	7.34E-04	3.21E-03
Flocklok 852	8.29	48.3%	0.0%	48.3%	0.71	4.00	2.84	68.2	12.5	65%	1.07	4.66	80%	0.21	0.93
S1213 Blend	7.46	100%	0.0%	100%	0.17	7.46	1.27	30.4	5.55	65%	0.00	0.00	80%	0.00	0.00
Total for each line							4.39		19.2		1.07	4.68		0.21	0.94
Total for 5 lines									96.2			28.1		1.07	4.68

Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lb/gal) x Weight % Organics
 PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)
 PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day
 PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency)
 PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)
 PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

2. PM/PM10 emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
 Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.
--

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for each line	3.79	16.6	0.038	0.17
Total for 5 lines		83.0		0.83

Allowable Emissions (each line):	0.551 lbs/hr
Allowable Emissions (each line):	2.41 tons/yr

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency
 PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)
 PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions from L1, EL1, EL2, 3B2, and BL

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

1. HAPs emissions from the coating operations (worst case scenario):

Material	Density (Lb/Gal)	Maximum Usage (gal/hr/line)	Weight % 4,4-Methylenediphenyl Diisocyanate	PTE of 4,4-Methylenediphenyl Diisocyanate (tons/yr)	Weight % Ethyl Benzene	PTE of Ethyl Benzene (tons/yr)	Weight % Methyl Isobutyl Ketone	PTE of Methyl Isobutyl Ketone (tons/yr)	Weight % Xylene	PTE of Xylene (tons/yr)
Primer	7.28	0.04	0.0%	0.00	20.0%	0.26	0.0%	0.00	80.0%	1.02
Flocklok 852	8.29	0.71	2.0%	0.52	10.0%	2.58	10.0%	2.58	25.0%	6.45
S1213 Blend	7.46	0.17	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00
Total for each line				0.52		2.83		2.58		7.47
Total for 5 lines				2.58		14.2		12.9		37.3
Total HAPs										67.0 tons/yr

METHODOLOGY

PTE of HAPs (tons/yr) = Density (lb/gal) x Max. Usage (gal/hr/line) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and Particulate Emissions from L2 and L3**

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

1. VOC and PM/PM10 emissions from the coating operations (worst case scenario):

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr/line)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls		
											PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
Nyatex	8.67	70.0%	59.7%	10.3%	0.86	0.89	0.77	18.4	3.36	65%	0.78	3.43	80%	0.16	0.69
S1213 Blend	7.46	100%	0.0%	100%	0.17	7.46	1.27	30.4	5.55	65%	0.00	0.00	80%	0.00	0.00
Total for each line							2.04		8.92		0.78	3.43		0.16	0.69
Total for 2 lines									17.8			6.86		0.31	1.37

Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lb/gal) x Weight % Organics
 PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)
 PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day
 PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1- Weight % Volatile) x (1-Transfer efficiency)
 PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1- Weight % Volatile) x (1-Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)
 PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

2. PM/PM10 Emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
 Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for each line	3.79	16.6	0.038	0.17
Total for 2 lines		33.2		0.33

Allowable Emissions (each line):	0.551 lbs/hr
Allowable Emissions (each line):	2.41 tons/yr

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency
 PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)
 PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions from L2 and L3**

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

1. HAPs emissions from the coating operations (worst case scenario):

Material	Density (lb/gal)	Maximum Usage (gal/hour/line)	Weight % 4,4-Methylenediphenyl Diisocyanate	Weight % Ethyl Benzene	Weight % Methyl Isobutyl Ketone	Weight % Xylene	Weight % Glycol Ethers	Weight % Dibutyl Phthalate
Nyatex 1127	8.67	0.86	0.0%	0.0%	0.0%	2.0%	2.0%	2.0%
S1213 Blend	7.46	0.17	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Material	same as above	Potential to Emit (tons/yr)						
		4,4-Methylenediphenyl Diisocyanate	Ethyl Benzene	Methyl Isobutyl Ketone	Xylene	Glycol Ethers	Dibutyl Phthalate	
Nyatex 1127		0.00	0.00	0.00	0.65	0.65	0.65	
S1213 Blend		0.00	0.00	0.00	0.00	0.00	0.00	
Total for each line		0.00	0.00	0.00	0.65	0.65	0.65	
Total for 2 lines		0.00	0.00	0.00	1.31	1.31	1.31	
							Total HAPs	3.92 tons/yr

METHODOLOGY

PTE of HAPs (tons/yr) = Density (lbs/gal) x Max. Usage (gal/hr/line) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and Particulate Emissions from Nisco, Lock Knob and Overhead Conveyor

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

1. VOC and PM/PM10 emissions from the coating operations (worst case scenario):

Process Line	Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls		
												PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
Nisco	FL 852	8.29	48.3%	0.0%	48.3%	0.06	4.00	0.24	5.77	1.05	65%	0.09	0.39	80%	0.02	0.08
	Cleaner	7.46	100%	0.0%	100%	0.06	7.46	0.45	10.7	1.96	65%	0.00	0.00	80%	0.00	0.00
Lock Knob	FL 852	8.29	48.3%	0.0%	48.3%	0.25	4.00	1.00	24.0	4.38	65%	0.38	1.64	80%	0.08	0.33
	Cleaner	7.46	100%	0.0%	100%	0.06	7.46	0.45	10.7	1.96	65%	0.00	0.00	80%	0.00	0.00
Overhead Conveyor	Nyatex Primer	7.28	96.4%	0.0%	96.4%	0.75	7.02	5.26	126	23.05	65%	0.07	0.30	80%	0.01	0.06
	Nyatex 1127	8.67	70.0%	59.7%	10.3%	1.50	0.89	1.34	32.1	5.87	65%	1.37	5.98	80%	0.27	1.20
	Cleaner	7.46	100%	0.0%	100%	0.06	7.46	0.45	10.7	1.96	65%	0.00	0.00	80%	0.0	0.0
							Totals	9.19	220	40.2		1.90	8.32		0.38	1.66

Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lb/gal) x Weight % Organics
 PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)
 PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day
 PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency)
 PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)
 PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

2. PM/PM10 emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
 Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for each line	3.79	16.6	0.038	0.17
Total for 3 lines		49.8		0.50

Allowable Emissions (each line):	0.551 lbs/hr
Allowable Emissions (each line):	2.41 tons/yr

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency
 PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)
 PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions from Nisco, Lock Knob and Overhead Conveyor

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

Process Line (Material)	Density (Lb/Gal)	Maximum Usage (gal/hr)	Weight % Ethyl Benzene	Weight % MIBK	Weight % Toluene	Weight % Xylene	Weight % MDI	Weight % Glycol Ethers	Weight % Dibutyl Phthalate
Nisco (FL 852)	8.29	0.06	10.00%	11.80%	6.30%	25.90%	1.60%	0.00%	0.00%
Lock Knob (FL 852)	8.29	0.25	10.00%	11.80%	6.30%	25.90%	1.60%	0.00%	0.00%
Overhead Conveyor (Nyatex Primer)	7.28	0.75	0.00%	0.00%	87.00%	8.00%	0.00%	0.00%	0.00%
Overhead Conveyor (Nyatex 1127)	8.67	1.50	0.00%	0.00%	0.00%	2.00%	0.00%	2.00%	2.00%

Process Line (Material)	Density (Lb/Gal)	Maximum Usage (gal/hr)	Potential to Emit (tons/yr)						
			Ethyl Benzene	MIBK	Toluene	Xylene	MDI	Glycol Ethers	Dibutyl Phthalate
Nisco (FL 852)	same as above		0.22	0.26	0.14	0.56	0.03	0.00	0.00
Lock Knob (FL 852)			0.91	1.07	0.57	2.35	0.15	0.00	0.00
Overhead Conveyor (Nyatex Primer)			0.00	0.00	20.8	1.91	0.00	0.00	0.00
Overhead Conveyor (Nyatex 1127)			0.00	0.00	0.00	1.14	0.00	1.14	1.14
Totals			1.13	1.33	21.5	5.97	0.18	1.14	1.14

**Total HAPs 32.4
 tons/yr**

METHODOLOGY

PTE of HAPS (tons/yr) = Density (lb/gal) x Max. Usage (gal/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and Particulate Emissions from L4**

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

1. VOC and PM/PM10 emissions from the coating operation:

Material	Density (Lb/Gal)	Weight % VOC	Weight % Solids	Weight % Xylene	Maximum Usage (gal/hr)	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls		
										PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
Nyatex	8.67	10.3%	30.0%	2.0%	1.00	0.89	21.4	3.91	65%	0.91	3.99	80%	0.18	0.80

Assume all the PM emissions are PM10 emissions.

METHODOLOGY

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)
 PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day
 PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency)
 PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)
 PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

2. PM/PM10 Emissions from the flocking operations:

PM/PM10 Collected: 3.00 lbs/hr of flock
 Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.
--

	PTE Before Controls			PTE After Controls	
	lbs/hr		tons/yr	lbs/hr	tons/yr
PM/PM10 for L4	3.03		13.3	0.030	0.13

Allowable Emissions:	0.551 lbs/hr
Allowable Emissions:	2.41 tons/yr

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency
 PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)
 PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions from L4

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

Process Line (Material)	Density (Lb/Gal)	Maximum Usage (gal/hr)	Weight % Ethyl Benzene	Weight % MIBK	Weight % Toluene	Weight % Xylene	Weight % MDI	Weight % Glycol Ethers
L4 (Nyatex 1127)	8.67	1.50	0.00%	0.00%	0.00%	2.00%	0.00%	2.00%

			Potential to Emit (tons/yr)					
Process Line (Material)	Density (Lb/Gal)	Maximum Usage (gal/hr)	Ethyl Benzene	MIBK	Toluene	Xylene	MDI	Glycol Ethers
L4 (Nyatex 1127)	8.67	1.50	0.00	0.00	0.00	1.14	0.00	1.14

Total HAPs

METHODOLOGY

PTE of HAPS (tons/yr) = Density (lb/gal) x Max. Usage (gal/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

Weight % Dibutyl Phthalate
2.00%

Dibutyl Pthalate
1.14
3.42

tons/yr

Appendix A: Emission Calculations
VOC and Particulate Emissions from GL1 and GL2

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

1. VOC Emissions

Emission Unit (ID)	Material	Density (lb/gal)	Weight % VOC	Weight % Water	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating	PTE VOC (lb/day)	PTE VOC (ton/yr)
Graphics Line 1 (GL1) Option 1	Nazdar 6254OKI	7.03	68.6%	0%	15.0	4.82	1,736	317
	KIWO (cleanup solvent)	7.56	100%	0%	0.13	7.56	23.6	4.30
	Mineral Spirits	6.42	100%	0%	0.13	6.42	20.0	3.66
Graphics Line 1 (GL1) Option 2	Wlilflex 10280FB (10265FB)	10.1	0.99%	0%	15.0	0.10	36.0	6.57
	KIWO (cleanup solvent)	7.56	100%	0%	0.13	7.56	23.6	4.30
	Mineral Spirits	6.42	100%	0%	0.13	6.42	20.0	3.66
Graphics Line 2 (GL2)	Nazdar 6254OKI	7.03	68.6%	0%	4.00	4.82	463	84.5
	KIWO (cleanup solvent)	7.56	100%	0%	0.13	7.56	23.6	4.30
	Mineral Spirits	6.42	100%	0%	0.13	6.42	20.0	3.66
Worst Case Totals							2,286	417

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

The coatings used do not contain any HAPs.

The coatings are applied with direct contact methods (screen printing and roll coating) with 100% transfer efficiency. No particulate is formed in the process.

METHODOLOGY

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

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

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

2. PM/PM10 Emissions from the flocking operations:

Emission Unit (ID)	Maximum Usage (lbs/hr)	Transfer Efficiency	Uncontrolled PTE of PM/PM10 (tons/yr)	Control Efficiency	Controlled PTE of PM/PM10 (tons/yr)	Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.
Graphics Line 1 (GL1)	15	35%	42.7	99%	0.43	
Graphics Line 2 (GL2)	4	35%	11.4	99%	0.11	
Assume transfer efficiency of 35 % for average work. Particulate is controlled with a baghouse having a control efficiency of 99%.						Allowable Emissions (each line): 0.551 lbs/hr
						Allowable Emissions (each line): 2.41 tons/yr

METHODOLOGY

Uncontrolled PTE of PM/PM10 (tons/yr) = Maximum Usage (lbs/hr) x (1 - Transfer Efficiency (%)) x 8,760 hrs/yr x 1 ton/2,000 lbs

Controlled PTE of PM/PM10 (tons/yr) = Uncontrolled PTE of PM/PM10 (tons/yr) x (1 - Control Efficiency (%))

Appendix A: Emission Calculations
Combustion Emissions from Natural Gas Combustion

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

Total Heat Input Capacity (MMBtu/hr)
2.60

Potential Throughput (MMCF/yr)
22.3

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

Potential To Emit (tons/yr)						
PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
0.02	0.08	0.01	1.12	0.94	0.06	0.02

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

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

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

All emission factors are based on normal firing.

Methodology

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

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

**Appendix A: Emission Calculations
Summary**

Company Name: EIS Fibercoating, Inc.
 Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP: 017-25075-00039
 Reviewer: ERG/ST
 Date: October 24, 2007

1. Uncontrolled and Unlimited Potential to Emit

Emission Unit(s)	Potential To Emit (tons/yr)							
	PM	PM10	SO ₂	NO _x	CO	VOC	Single HAP	Total HAPs
L1, EL1, EL2, 3B2, and BL	111	111	0.00	0.00	0.00	96.2	30.9 (xylene)	67.0
L2 and L3	40.0	40.0	0.00	0.00	0.00	17.8	1.31 (xylene)	3.92
Nisco, Lock Knob and Overhead Conveyor	58.1	58.1	0.00	0.00	0.00	40.2	5.97 (xylene)	32.4
L4	17.3	17.3	0.00	0.00	0.00	3.91	1.14 (xylene)	3.42
GL1 and GL2	54.1	54.1	0.00	0.00	0.00	417	0.00	0.00
Natural Gas Combustion	0.02	0.08	0.01	1.12	0.94	0.06	0.02	0.02
Totals	281	281	0.01	1.12	0.94	575	39.3 (xylene)	107

2. Controlled and Limited Potential to Emit

Emission Unit(s)	Potential To Emit (tons/yr)							
	PM	PM10	SO ₂	NO _x	CO	VOC	Single HAP	Total HAPs
L1, EL1, EL2, 3B2, and BL	5.51	5.51	0.00	0.00	0.00	Less than 99	Less than 9.9	Less than 24.9
L2 and L3	1.70	1.70	0.00	0.00	0.00			
Nisco, Lock Knob and Overhead Conveyor	2.16	2.16	0.00	0.00	0.00			
L4	0.93	0.93	0.00	0.00	0.00			
GL1 and GL2	0.54	0.54	0.00	0.00	0.00	0.06	0.02	0.02
Natural Gas Combustion	0.02	0.08	0.01	1.12	0.94			
Totals	10.9	10.9	0.01	1.12	0.94	Less than 100	Less than 10	Less than 25