



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: November 29, 2007
RE: Avery Dennison / 089-25268-00407
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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-AM.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251
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(800) 451-6027
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Mr. Kevin Cherney
Avery Dennison
670 Hardy Road, Bldg. 11
Painesville, Ohio 44077

November 29, 2007

RE: 089-25268-00407
First Administrative Amendment to
Part 70 Operating Permit No.:T089-7463-00407

Dear Mr. Cherney:

On September 11, 2007, an application was received from Avery Dennison located at 270 West Meadow Place, Lowell, Indiana 46356. The application requested the replacement of three natural gas fired thermal oxidizers rated at 6.9 MMBtu/hr, 9.8 MMBtu/hr and 11.2 MMBtu/hr, with a single natural gas fired thermal oxidizer, identified as C-1, rated at 20 MMBtu/hr.

Additionally, IDEM, OAQ is revising certain sections or portions of the permit to accommodate regulatory and/or administrative changes. The bold faced language is new language that has been added and the strikethrough language has been removed. Pursuant to the provisions of 326 IAC 2-7-11a(7), the permit is hereby administratively changed as follows:

- 1) To minimize future amendments and errors, the page numbers have been removed from the table of contents. Also, the table of contents has been updated to reflect the administrative changes shown in this document. Typographical and formatting errors have been corrected. The table of contents has been updated to match the rule citations and condition titles in the permit.
2) To minimize future amendments, the OAQ has decided to delete the name and/or title of the Responsible Official (RO) in Section A.1, General Information, of the permit. However, OAQ will still be evaluating if a change in RO meets the criteria specified in 326 IAC 2-7-1(34). In addition, the county attainment status, the source status, mailing address and rule citations have been updated or clarified. The revised A.1 Section follows:

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

The Permittee owns and operates a stationary vinyl coated manufacturing operation.

Responsible Official: Heinz Pichler, Vice President, Worldwide Graphics
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356
250 Chester Street, Painesville, Ohio 44077
SIC Code: 3089
County Location: Lake
County Status: Severe Nonattainment for 8-hour Ozone, and for PM2.5,
Attainment for all other criteria pollutants.
Source Status: Part 70 Permit Program;
Major Source, under Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act; and
Not 1 of 28 Source Categories.

- 3) Section A.2 has been updated to reflect the removal of three existing thermal oxidizers and the addition of a single 20 MMBtu/hr thermal oxidizer, identified as C-1. There are no changes in throughput. The revised A.2 Section follows:

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

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

- (a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using ~~one (1) a 6.9~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, exhausting to ~~one (1)-stack (S-1)~~;
- (b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using ~~one (1) a 9.8~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, exhausting to ~~one (1) stack (S-21)~~; and
- (c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using ~~one (1) a 44.2~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, except when using emulsion coating, and exhausting to ~~one (1) stack (S-31)~~.
- 4) All references to IDEM, OAQ's mailing address have been revised as follows:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-53 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Modeling Section, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-50 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-52 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-53 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-53 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-53 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

- 5) All references to the IDEM, OAQ, Compliance Section telephone number have been revised as follows: ~~317-233-5674~~ **317-233-0178**.

6) All references to the IDEM, OAQ, Compliance Section facsimile number have been revised as follows: ~~317-233-5967~~ **317-233-6865**.

7) The contact information for the Annual Fee Payment has been revised as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 ~~317-233-0425 (ask for OAQ, Technical Support and Modeling Section)~~, to determine the appropriate permit fee. **317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate fee.**
- 8) The descriptive information in Section D.1 has been modified to reflect the removal of three existing thermal oxidizers and the addition of one 20 MMBtu/hr unit, identified as C-1. The revisions follow:

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using ~~one (1) a 6.9~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, exhausting to ~~one (1)~~ stack (S-1);
- (b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using ~~one (1) a 9.8~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, exhausting to ~~one (1)~~ stack (S-21); and
- (c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using ~~one (1) a 11.2~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, except when using emulsion coating, and exhausting to ~~one (1)~~ stack (S-31).

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

- 9) The descriptive information in Condition D.1.1(b) has been modified to clarify the conditions under which the thermal oxidizer, identified as C-1, is not required to be in operation. The revised condition follows:

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

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator.
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, two and nine-tenths (2.9) pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer for line L-3 shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer **identified as C-1** are required by 326 IAC 8-1-2(a)(2), ~~except when emulsion coating is being used in L-3~~ **when non-compliant coatings are used in any of the lines**. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 47.85 pounds per gallon of coating solids delivered to the applicator.
- 10) The descriptive information in Condition D.1.4 has been modified to reflect the new thermal oxidizer identified as C-1. The revised condition follows:

D.1.4 Volatile Organic Compounds and HAPs [326 IAC 2-3] [326 IAC 2-4.1]

- Input of VOC and HAP to the surface coating head (CH-1) shall be limited to less than five hundred (500) tons per year. At a control efficiency of at least 98% for the thermal oxidizer **identified as C-1**, these usage limits shall effectively limit emissions of VOC and HAP to less than ten (10) tons per year. Compliance with these limits shall make the Emission Offset and New source Toxics Control rules not applicable.
- 11) The descriptive information in Condition D.1.10(b) has been modified to clarify the conditions under which the thermal oxidizer, identified as C-1, is not required to be in operation. The revised condition follows:

D.1.10 Thermal Oxidizer

To ensure compliance with Conditions D.1.1 and D.1.2:

- (a) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl rollcoating line (identified as L-2) is in operation. The thermal oxidizer shall maintain a minimum operating temperature of 1,083 °F or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.
- (b) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is in operation, except when using emulsion coating **and neither L-1 or L-2 are in operation**. The thermal oxidizer shall maintain a minimum operating temperature of 1,273 °F or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit Renewal, with all modification and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact David J. Matousek, OAQ, 100 North Senate Avenue, MC61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at (800) 451-6027, and ask for David Matousek or extension 4-5174, or dial (317) 234-5174.

Original signed by,

Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

Attachments: Copy of revised permit
DJM/djm

cc: File - Lake County
Lake County Health Department
Northwest Regional Office
Air Compliance Inspector
Administrative and Development Section
Compliance Branch
Technical Support and Modeling
U.S. EPA Region V



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Part 70 Operating Permit OFFICE OF AIR QUALITY

**Avery Dennison
270 West Meadow Place
Lowell, Indiana 46356**

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

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

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

Operation Permit No.: T089-7463-00407	
Issued by: Original signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 14, 1999 Expiration Date: July 14, 2004

First Significant Permit Modification No. 089-12832-00407, issued on January 26, 2001;
First Reopening No. R089-13358-00407, issued on October 19, 2001; and
First Minor Permit Modification No. 089-17858-00407, issued on December 9, 2003.

First Administrative Amendment No.:089-25268-00407	
Original signed by: Donald F. Robin, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 29, 2007

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D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Compliance Determination Requirements

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary vinyl coated manufacturing operation.

Source Address:	270 West Meadow Place, Lowell, Indiana 46356
Mailing Address:	250 Chester Street, Painesville, Ohio 44077
SIC Code:	3089
County Location:	Lake
County Status:	Nonattainment for 8-hour Ozone and PM _{2.5} , Attainment for all other criteria pollutants.
Source Status:	Part 70 Permit Program; Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act; and Not 1 of 28 Source Categories.

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

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

- (a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using a 20 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, identified as C-1, for VOC control, exhausting to stack (S-1);
- (b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using a 20 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, identified as C-1, for VOC control, exhausting to stack (S-1); and
- (c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using a 20 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, identified as C-1, for VOC control, except when using emulsion coating, and exhausting to stack (S-1).

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

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

- (a) VOC and HAP storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(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
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within ten (10) calendar days from the date of the discovery of the deviation.
- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ nor an authorized

representative, may disclose the information unless and until IDEM, OAQ makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAQ acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:
- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
 - (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]
The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). The source does not have any fugitive Particulate Matter (PM) emissions and therefore comply with this opacity limit.
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]
(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, MC61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods 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, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Temperature Gauge Specifications

Unless otherwise specified in Section D of this permit, whenever a condition in this permit requires the measurement of temperature drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 11, 1996 with the Part 70 Permit Application.
- (b) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be

subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance

with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, MC61-50 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (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, MC61-53 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, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using a 20 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, identified as C-1, for VOC control, exhausting to stack (S-1);
- (b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using a 20 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, identified as C-1, for VOC control, exhausting to stack (S-1); and
- (c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using a 20 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, identified as C-1, for VOC control, except when using emulsion coating, and exhausting to stack (S-1).

(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 2-7-5(1)]

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

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator.
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, two and nine-tenths (2.9) pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer for line L-3 shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer identified as C-1 are required by 326 IAC 8-1-2(a)(2), when non-compliant coatings are used in any of the lines. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 47.85 pounds per gallon of coating solids delivered to the applicator.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442(a)(2), the Permittee shall demonstrate a ninety percent (90%) overall Volatile Organic Compound (VOC) emission reduction as calculated over a calendar month for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3).

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds and HAPs [326 IAC 2-3] [326 IAC 2-4.1]

Input of VOC and HAP to the surface coating head (CH-1) shall be limited to less than five hundred (500) tons per year. At a control efficiency of at least 98% for the thermal oxidizer identified as C-1, these usage limits shall effectively limit emissions of VOC and HAP to less than ten (10) tons per year. Compliance with these limits shall make the Emission Offset and New source Toxics Control rules not applicable.

D.1.5 Compliance Provisions [40 CFR 60.443, Subpart RR]

Pursuant to 40 CFR 60.443:

- (a) To determine compliance with § 60.442(a)(2), the Permittee shall calculate the required overall Volatile Organic Compound (VOC) emission reduction for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) according to the following equation:

$$R_q = (G - 0.20) / G * 100$$

where:

G = the calculated weighted average pound of Volatile Organic Compound (VOC) per pound of coating solids applied each calendar month.

If R_q is less than or equal to 90 percent, then the required overall Volatile Organic Compound (VOC) emission reduction is R_q . If R_q is greater than 90 percent, then the required overall Volatile Organic Compound (VOC) emission reduction is 90 percent.

- (b) The Permittee shall determine calendar monthly compliance for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) by comparing the monthly required overall Volatile Organic Compound (VOC) emission reduction R_q to the overall Volatile Organic Compound (VOC) emission reduction demonstrated in the most recent performance test which complied with § 60.442(a)(2). If the monthly required overall Volatile Organic Compound (VOC) emission reduction is less than or equal to the overall Volatile Organic Compound (VOC) reduction of the most recent performance test, the affected facility is in compliance with § 60.442(a)(2).
- (c) The Permittee shall continuously record the destruction device combustion temperature for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) during coating operations for thermal incineration destruction devices. The Permittee shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with § 60.442(a)(2).
- (d) After the initial performance test required for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) under § 60.8, compliance with the Volatile Organic Compound (VOC) emission reduction limitation and percentage reduction requirements under § 60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average Volatile Organic Compound (VOC) emission reduction is calculated to show compliance with the standard.

- (e) Startups and shutdowns are normal operations for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). Emissions from these operations are to be included when determining if the standard specified at § 60.442(a)(2) is being attained.

D.1.6 Testing Requirements [40 CFR 60.444, Subpart RR]

- (a) Pursuant to 40 CFR 60.444, Subpart RR, the performance test for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) shall be determined by averaging the results of three test runs as specified in § 60.8(f).
 - (1) Determine for each affected facility prior to each test run the weighted average mass of Volatile Organic Compound (VOC) per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in § 60.443(a). In this application, the quantities of W_{ci} , W_{si} , and M_{ci} shall be determined for the time period of each test run and not a calendar month as specified in § 60.441.
 - (2) Calculate the required percent overall Volatile Organic Compound (VOC) emission reduction R_q .
 - (3) Determine the percent overall Volatile Organic Compound (VOC) emission reduction device by the following equation and procedures:

$$R = [Q_{bi} C_{bi} - Q_{aj} C_{aj}] / [Q_{bi} C_{bi} + Q_{fk} C_{fk}] * 100$$

where:

- Q_{bi} = the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic feet per hour.
 - C_{bi} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.
 - Q_{aj} = the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic feet per hour.
 - C_{aj} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.
 - Q_{fk} = the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic feet per hour.
 - C_{fk} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.
- (A) The Permittee shall construct the overall Volatile Organic Compound (VOC) emission reduction systems to that all volumetric flow rates and total Volatile Organic Compound (VOC) emissions can be accurately determined by the applicable test method and procedures specified in § 60.446(b).
 - (B) The Permittee shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive Volatile Organic Compound (VOC) emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Commissioner is satisfied that the enclosure is totally capturing fugitive Volatile Organic Compound (VOC) emissions, then no additional total enclosure will be required for the performance test.

- (C) For each affected facility where the value of R is greater than or equal to the value of R_q calculated in § 60.443(b), compliance with § 60.442(a)(2) is demonstrated.
- (b) Pursuant to 40 CFR 60.446, Subpart RR:
- (1) Reference Test Method 25 shall be used to determine the Volatile Organic Compound (VOC) concentration in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). Reference Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled gas streams. For Reference Method 25 and 25A, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Commissioner.
 - (2) If the Permittee can demonstrate to the Commissioner's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Commissioner will approve testing of representative stacks on a case-by-case basis.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Volatile Organic Compounds (VOC) and HAPs [326 IAC 2-3] [326 IAC 2-4.1]

Compliance with the VOC and HAP usage limitations contained in Condition D.1.4 shall be determined using formulation data supplied by the coating manufacturer.

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

D.1.9 Volatile Organic Compound (VOC) [40 CFR 60.445, Subpart RR]

Pursuant to 40 CFR 60.445, the Permittee shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 2.5 °C.

D.1.10 Thermal Oxidizer

To ensure compliance with Conditions D.1.1 and D.1.2:

- (a) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl rollcoating line (identified as L-2) is in operation. The thermal oxidizer shall maintain a minimum operating temperature of 1,083 °F or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.
- (b) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is in operation, except when using emulsion coating and neither L-1 or L-2 are in operation. The thermal oxidizer shall maintain a minimum operating temperature of 1,273 °F or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.

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

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) Pursuant to 40 CFR 60.445:
- (1) The Permittee shall maintain a calendar month record of all coatings used for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) and the results of the reference test method specified in § 60.446(a) or the manufacturer's formulation data used for determining the Volatile Organic Compound (VOC) content of those coatings.
 - (2) Records of the measurements required by §§ 60.443 and 60.445 must be retained for at least two years following the date of the measurements.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements [40 CFR 60.447, Subpart RR]

- (a) For the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3), the performance test and results from the performance test shall be submitted to the Commissioner as specified in § 60.8(a) of the General Provisions (40 CFR part 60, subpart A).
- (b) Following the initial performance test for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3), the Permittee shall submit quarterly reports to the Commissioner of exceedances of the Volatile Organic Compound (VOC) emission limits specified in § 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Commissioner semi-annually.
- (c) The Permittee shall also submit reports at the frequency specified in § 60.7(c) when the incinerator temperature drops as defined in § 60.443(e). If no such periods occur, the Permittee shall state this in the report.

- (d) The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternate means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

D.1.13 Reporting Requirements [326 IAC 2-3]

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(Insignificant Activity)

- (a) VOC and HAP storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons

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

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8]

Any change or modification to these facilities that would increase potential volatile organic compound (VOC) emissions, as specified in 326 IAC 2-1, must be approved by the Office of Air Quality (OAQ) before such change or modification can occur.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.2.3 Monitoring

Monitoring of this facility is not required by this permit. However any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

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

D.2.4 Record Keeping Requirements

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall maintain the following records for the life of each storage tank:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(Insignificant Activity)

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

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

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

D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9 °C) (one hundred twenty degrees Fahrenheit (120 °F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.3.4 Monitoring

Monitoring of this facility is not required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Avery Dennison
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 250 Chester Street, Painesville, Ohio 44077
Part 70 Permit No.: T089-7463-00407

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)
- 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 DATA SECTION
P.O. Box 6015
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Avery Dennison
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 250 Chester Street, Painesville, Ohio 44077
Part 70 Permit No.: T089-7463-00407

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input type="checkbox"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <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); andThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16
<input type="checkbox"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <ul style="list-style-type: none">The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? 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/deviation:
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 by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

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

**PART 70 OPERATING PERMIT
SEMIANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Avery Dennison
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 250 Chester Street, Painesville, Ohio 44077
Part 70 Permit No.: T089-7463-00407

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 250 Chester Street, Painesville, Ohio 44077
Part 70 Permit No.: 089-7463-00407
Facility: Surface Coating Head CH-1
Parameter: VOC/HAP
Limit: Five Hundred (500) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC/HAP Usage (tons)	VOC/HAP Usage (tons)
	This Month	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**

**Technical Support Document (TSD) for a Part 70 Operating Permit
Administrative Amendment**

Source Description and Location

Source Name:	Avery Dennison
Source Location:	270 West Meadow Place, Lowell, Indiana 46356
County:	Lake County
SIC Code:	3089
Operation Permit No.:	T089-7463-00407
Operation Permit Issuance Date:	July 14, 1999
Administrative Amendment No.:	089-25268-00407
Permit Reviewer:	David J. Matousek

Existing Approvals

The source submitted an application for a Part 70 Operating Permit Renewal on August 22, 2003. At this time, this application is still under review. The source is operating under the following approvals:

- (a) Part 70 Operating Permit No. T089-7463-00407, issued on July 14, 1999;
- (b) First Significant Permit Modification No. 089-12832-00407, issued on January 26, 2001;
- (c) First Reopening No. R089-13358-00407, issued on October 19, 2001; and
- (d) First Minor Permit Modification No. 089-17858-00407, issued on December 9, 2003.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM ₁₀	Maintenance Attainment
PM _{2.5}	Nonattainment
SO ₂	Maintenance Attainment
NOx	Attainment
8-hour Ozone	Moderate Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
 - (1) On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's

previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for non-attainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability for the source section.

- (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the requirements of Non-attainment New Source Review.

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

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

- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (ton/yr)
PM	1.0
PM ₁₀	1.0
SO ₂	0.0
VOC	12.0
CO	9.0
NO _x	10.0
Total HAPs	not reported

Description of Proposed Modification

On September 11, 2007, an application was received from Avery Dennison located at 270 West Meadow Place, Lowell, Indiana 46356. The application requested the replacement of three natural gas fired thermal oxidizers rated at 6.9 MMBtu/hr, 9.8 MMBtu/hr and 11.2 MMBtu/hr, with a single natural gas fired thermal oxidizer, identified as C-1, rated at 20 MMBtu/hr.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S-1	L-1, L-2 & L-3	41.0	4.36	52,000	325

Emission Calculations

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

Permit Level Determination – Part 70

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

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

Pollutant	Potential To Emit (ton/yr)
PM	0.2
PM ₁₀	0.7
SO ₂	0.1
VOC	0.5
CO	7.4
NO _x	8.8

HAPs	Potential To Emit (ton/yr)
Hexane	0.16
Formaldehyde	0.01
TOTAL	0.17

Pursuant to 326 IAC 2-7-11(a)(8)(A), the permit will be administratively amended since the modification involves the addition of an exempt activity pursuant to 326 IAC 2-1.1-3(e)(1)(A). Also, the administrative amendment includes the revision of descriptive information pursuant to 326 IAC 2-7-11(a)(7).

Federal Rule Applicability Determination

There are no new federal rules applicable to the source due to this modification.

State Rule Applicability Determination

There are no new state rules applicable to the source due to the modification.

Compliance Determination and Monitoring Requirements

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

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

There are no new changes to compliance determination and monitoring requirements due to this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T089-7463-00407. Deleted language appears as ~~strikeouts~~ and new language appears in **bold**:

- 1) To minimize future amendments and errors, the page numbers have been removed from the table of contents. Also, the table of contents has been updated to reflect the administrative changes shown in this document. Typographical and formatting errors have been corrected. The table of contents has been updated to match the rule citations and condition titles in the permit.
- 2) To minimize future amendments, the OAQ has decided to delete the name and/or title of the Responsible Official (RO) in Section A.1, General Information, of the permit. However, OAQ will still be evaluating if a change in RO meets the criteria specified in 326 IAC 2-7-1(34). In addition, the county attainment status, the source status, mailing address and rule citations have been updated or clarified. The revised A.1 Section follows:

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

The Permittee owns and operates a stationary vinyl coated manufacturing operation.

Responsible Official:	Heinz Pichler, Vice President, Worldwide Graphics
Source Address:	270 West Meadow Place, Lowell, Indiana 46356
Mailing Address:	270 West Meadow Place, Lowell, Indiana 46356 250 Chester Street, Painesville, Ohio 44077
SIC Code:	3089
County Location:	Lake
County Status:	Severe Nonattainment for 8-hour Ozone, and PM_{2.5} , Attainment for all other criteria pollutants.

Source Status: Part 70 Permit Program;
Major Source, under Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act; and
Not 1 of 28 Source Categories.

- 3) Section A.2 has been updated to reflect the removal of three existing thermal oxidizers and the addition of a single 20 MMBtu/hr thermal oxidizer, identified as C-1. There are no changes in throughput. The revised A.2 Section follows:

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

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

- (a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using ~~one (1) a 6.9~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, exhausting to ~~one (1)~~ stack (S-1);
- (b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using ~~one (1) a 9.8~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, exhausting to ~~one (1)~~ stack (S-21); and
- (c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using ~~one (1) a 41.2~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for** VOC control, except when using emulsion coating, and exhausting to ~~one (1)~~ stack (S-31).
- 4) All references to IDEM, OAQ's mailing address have been revised as follows:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-53 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Modeling Section, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-50 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-52 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-53 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC61-53 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015 **MC61-53 IGCN 1003**
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

- 5) All references to the IDEM, OAQ, Compliance Section telephone number have been revised as follows: ~~317-233-5674~~ **317-233-0178**.
- 6) All references to the IDEM, OAQ, Compliance Section facsimile number have been revised as follows: ~~317-233-5967~~ **317-233-6865**.
- 7) The contact information for the Annual Fee Payment has been revised as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 ~~317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.~~ **317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate fee.**
- 8) The descriptive information in Section D.1 has been modified to reflect the removal of three existing thermal oxidizers and the addition of one 20 MMBtu/hr unit, identified as C-1. The revisions follow:

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using ~~one (1) a 6.9~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for VOC control, exhausting to one (1)-stack (S-1);**
- (b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using ~~one (1) a 9.8~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for VOC control, exhausting to one (1)-stack (S-21); and**
- (c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using ~~one (1) a 11.2~~ **20** million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, **identified as C-1, as for VOC control, except when using emulsion coating, and exhausting to one (1)-stack (S-31).**

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

- 9) The descriptive information in Condition D.1.1(b) has been modified to clarify the conditions under which the thermal oxidizer, identified as C-1, is not required to be in operation. The revised condition follows:

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

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator.
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, two and nine-tenths (2.9) pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer for line L-3 shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer **identified as C-1** are required by 326 IAC 8-1-2(a)(2), ~~except when emulsion coating is being used in L-3~~ **when non-compliant coatings are used in any of the lines**. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 47.85 pounds per gallon of coating solids delivered to the applicator.

- 10) The descriptive information in Condition D.1.4 has been modified to reflect the new thermal oxidizer identified as C-1. The revised condition follows:

D.1.4 Volatile Organic Compounds and HAPs [326 IAC 2-3] [326 IAC 2-4.1]

Input of VOC and HAP to the surface coating head (CH-1) shall be limited to less than five hundred (500) tons per year. At a control efficiency of at least 98% for the thermal oxidizer **identified as C-1**, these usage limits shall effectively limit emissions of VOC and HAP to less than ten (10) tons per year. Compliance with these limits shall make the Emission Offset and New source Toxics Control rules not applicable.

- 11) The descriptive information in Condition D.1.10(b) has been modified to clarify the conditions under which the thermal oxidizer, identified as C-1, is not required to be in operation. The revised condition follows:

D.1.10 Thermal Oxidizer

To ensure compliance with Conditions D.1.1 and D.1.2:

- (a) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl rollcoating line (identified as L-2) is in operation. The thermal oxidizer shall maintain a minimum operating temperature of 1,083 °F or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.
- (b) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is in operation, except when using emulsion coating **and neither L-1 or L-2 are in operation**. The thermal oxidizer shall maintain a minimum operating temperature of 1,273 °F or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.

Conclusion and Recommendation

The proposed modification shall be subject to the conditions of the attached proposed Part 70 Operating Permit Administrative Amendment No. 089-25268-00407. The staff recommends to the Commissioner that this Part 70 Operating Permit Administrative Amendment be approved.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only - Thermal Oxidizer
MM BTU/HR <100**

Company Name: Avery Dennison
Address City IN Zip: 270 West Meadow Place, Lowell, Indiana 46356
Part 70 Operating Permit No.: T 089-7463-00407
Permit Number: 089-25268-00407
Reviewer: David J. Matousek
Date: September 28, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

20.0

175.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.2	0.7	0.1	8.8	0.5	7.4

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

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

Company Name: Avery Dennison
Address City IN Zip: 270 West Meadow Place, Lowell, Indiana 46356
Part 70 Operating Permit No.: T089-7463-00407
Permit Number: 089-25268-00407
Reviewer: David J. Matousek
Date: September 28, 2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.840E-04	1.051E-04	6.570E-03	1.577E-01	2.978E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.380E-05	9.636E-05	1.226E-04	3.329E-05	1.840E-04

Methodology is the same as page 1.

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