INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 24, 2008

RE: Holland Colours Americas, Inc. / 177-26602-00051

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07

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September 24, 2008

Ms. Lee Ann Boggs
Holland Colours Americas, Inc.
1501 Progress Drive
Richmond, Indiana 47374

Re: 177-26602-00051
First Significant Revision to
F177-16240-00051

Dear Ms. Boggs:

Holland Colours Americas, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) No. F177-16240-00051 on July 2, 2004 for a stationary colorant manufacturing plant located at 1501 Progress Drive, Richmond, Indiana 47374. In the Second Administrative Amendment No. 177-25806-00051, issued on February 25, 2008, the source requested that the existing Holcobatch Unit 6 be removed from the permit. However, this unit was never removed from the source. On May 28, 2008, the Office of Air Quality (OAQ) received an application from the source requesting to modify and operate this emission unit, which will now be identified as Holcovinyl Unit 1. In addition, the source notified IDEM of an unpermitted emission unit, identified as one (1) Pre Weigh Unit, which was constructed and operated prior to receipt of the proper permit. Finally, Holland Colours Americas, Inc. requested changes to the existing emission unit descriptive information and the existing visible emission notation and parametric monitoring requirements. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

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

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless

modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

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 Brian Williams, of my staff, at 317-234-5375 or 1-800-451-6027, and ask for extension 4-5375.

Sincerely,

Original document signed by

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/BMW

cc: File - Wayne County
Wayne County Health Department
U.S. EPA, Region V
Air Compliance Section
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development
Billing, Licensing and Training Section

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

Holland Colours Americas, Inc.
1501 Progress Drive
Richmond, Indiana 47374

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F 177-16240-00051	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 2, 2004 Expiration Date: July 2, 2009
First Administrative Amendment No. 177-20464-00051, issued on January 3, 2005	
Second Administrative Amendment No. 177-25806-00051, issued on February 25, 2008	

First Significant Permit Revision No: 177-26602-00051	Pages Affected: Entire Permit
Issued by: *Original document signed by* Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 24, 2008 Expiration Date: July 2, 2009

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary colorant manufacturing source.

Source Address:	1501 Progress Drive, Richmond, Indiana 47374 and 1500 NW O Street, Richmond, IN, 47374
Mailing Address:	1501 Progress Drive, Richmond, Indiana 47374
General Source Phone:	(765) 935-0329
SIC Code:	2865
Source Location Status:	Wayne Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

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

(a) Seven (7) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing, and spraying to form beads (the product):

(1) Unit 1, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;

(2) Unit 2, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;

(3) Unit 3, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;

(4) Unit 4, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;

(5) Unit 5, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour;

(6) Unit 7, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour; and

(7) Unit 8, controlled by cartridge dust collector #4, exhausting to Stack #4, capacity: 342 pounds per hour.

(b) One (1) Holcomax production unit, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 225 pounds per hour.

(c) One (1) Holcovinyl unit, identified as Holcovinyl Unit 1, constructed in 2004, approved for modification in 2008, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 161 pounds per hour.

(d) One (1) Pre Weigh Unit, identified as Pre Weigh Unit, constructed in 2006, with a maximum capacity of 688 pounds per hour, controlled by a portable dust collector, and exhausting to the indoors.

(e) One (1) Holcopet mixer, identified as Holcopet Unit 1, controlled by cartridge dust collector #27, which exhausts to Stack #27, capacity: 247 pounds per hour.

(f) Three (3) Holcosil units, identified as #1, #2 and #3, controlled by cartridge dust collector #28, installed in 2008, which exhausts to Stack #28, capacity: 247 pounds per hour, each.

(g) One (1) Holcosil unit, identified as Holcosil HCR, approved for construction in 2008, controlled by cartridge dust collector #28, which exhausts to Stack #28, capacity: 10 pounds per hour.

(h) One (1) Holcoprill process, identified as Unit 1, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by cartridge dust collector #27, which exhausts to Stack #27, capacity: 100 pounds per hour.

(i) One (1) Holcoprill process, identified as Unit 2, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by cartridge dust collector #27, which exhausts to Stack #27, capacity: 1,100 pounds per hour.

(j) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):

(1) Unit A, controlled by cartridge dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour; and

(2) Unit B, controlled by cartridge dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

(1) Eleven (11) natural gas-fired heaters, rated at 0.225 million British thermal units per hour, each.

(2) Two (2) natural gas-fired heaters, rated at 0.03 million British thermal units per hour, each.

(3) Four (4) natural gas-fired heaters, rated at 0.400 million British thermal units per hour, each.

(4) Four (4) natural gas-fired heaters, rated at 0.215 million British thermal units per hour, each.

(5) One (1) natural gas-fired furnace, rated at 0.05 million British thermal units per hour.

(6) One (1) natural gas-fired furnace, rated at 0.15 million British thermal units per hour.

(7) One (1) natural gas-fired furnace, rated at 0.231 million British thermal units per hour.

(8) Two (2) natural gas-fired furnaces, rated at 0.13 million British thermal units per hour.

(9) One (1) natural gas-fired heater, rated at 0.080 million British thermal units per hour.

(10) One (1) natural gas-fired heater, rated at 0.100 million British thermal units per hour.

(11) One (1) natural gas-fired heater, rated at 0.060 million British thermal units per hour.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Three (3) parts washers, capacity: 30 gallons, each. [326 IAC 8-3-2] [326 IAC 8-3-5]

(c) Other categories with emissions below the insignificant thresholds:

(1) LSR Production, capacity: 90,000 pounds per year.

(2) Laboratory extruder, controlled by one (1) dust collector.

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

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

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

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

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

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

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

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

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

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

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

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

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

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the

emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

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

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for

which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

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

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

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-

8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-17-3-2] [IC13-30-3-1]

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

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

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

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

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

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

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

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

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

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

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

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

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

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

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

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Building #1

(a) Seven (7) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing, and spraying to form beads (the product):

(1) Unit 1, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;

(2) Unit 2, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;

(3) Unit 3, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;

(4) Unit 4, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;

(5) Unit 5, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour;

(6) Unit 7, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour; and

(7) Unit 8, controlled by cartridge dust collector #4, exhausting to Stack #4, capacity: 342 pounds per hour.

(b) One (1) Holcomax production unit, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 225 pounds per hour.

(c) One (1) Holcovinyl unit, identified as Holcovinyl Unit 1, constructed in 2004, approved for modification in 2008, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 161 pounds per hour.

(d) One (1) Pre Weigh Unit, identified as Pre Weigh Unit, constructed in 2006, with a maximum capacity of 688 pounds per hour, controlled by a portable dust collector, and exhausting to the indoors.

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

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

D.1.1 Particulate Matter (PM_{10}) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM_{10} emissions shall not exceed the hourly rates expressed in the following table:

Unit ID	Hourly PM_{10} Limit (lbs/hr)
Holcobatch Unit 1	1.163
Holcobatch Unit 2	1.163
Holcobatch Unit 3	1.163
Holcobatch Unit 4	1.163
Holcobatch Unit 5	0.34
Holcobatch Unit 7	0.34
Holcobatch Unit 8	1.163
Holcomax	1.53
Holcovinyl Unit 1	1.095
Pre Weigh Unit	4.094

Compliance with the above limitations will render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from each Holcobatch Unit, the Holcomax Unit, the Holcovinyl Unit, and the Pre Weight Unit shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.1.3 HAPs [326 IAC 2-4.1]

Any change or modification that would increase pigment usage from the entire source such that the worst case single HAP usage increases to one thousand (1,000) tons per year or more, or total HAPs usage increases to 2,500 tons per year or more, may cause the source to become a major source of HAPs emissions, and shall require prior IDEM, OAQ approval.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.1 and D.1.2, the dust collectors for particulate control shall be in operation and control emissions from each Holcobatch Unit, the Holcomax Unit, the Holcovinyl Unit, and the Pre Weight Unit at all times that these facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the Holcobatch Units and the Holcomax process stack exhausts (Stacks #2, #3, and #4) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

D.1.7 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the dust collectors used in conjunction with Holcobatch Units 1 through 7 and the Holcomax process, at least once per day when any of the processes are in operation. When for any one reading, the pressure drop across the dust collectors is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop across the dust collector used in conjunction with the Holcobatch Unit 8, at least once per day when the process is in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 1.0 and 7.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.3, the Permittee shall maintain monthly records of the amount of each HAPs used.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the Holcobatch Units and the Holcomax process stack exhausts (Stacks #2, #3, and #4) once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in its daily record when the pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.2 FACILITY CONDITIONS

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

(e) One (1) Holcopet mixer, identified as Holcopet Unit 1, controlled by cartridge dust collector #27, which exhausts to Stack #27, capacity: 247 pounds per hour.

(f) Three (3) Holcosil units, identified as #1, #2 and #3, controlled by cartridge dust collector #28, installed in 2008, which exhausts to Stack #28, capacity: 247 pounds per hour, each.

(g) One (1) Holcosil unit, identified as Holcosil HCR, approved for construction in 2008, controlled by cartridge dust collector #28, which exhausts to Stack #28, capacilty: 10 pounds per hour.

(h) One (1) Holcoprill process, identified as Unit 1, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by cartridge dust collector #27, which exhausts to Stack #27, capacity: 100 pounds per hour.

(i) One (1) Holcoprill process, identified as Unit 2, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by cartridge dust collector #27, which exhaust to Stack #27, capacity: 1,100 pounds per hour.

(j) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):

(1) Unit A, controlled by cartridge dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour; and

(2) Unit B, controlled by cartridge dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.2.4 Particulate Matter (PM_{10}) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM_{10} emissions shall not exceed the hourly rates expressed in the following table:

Unit ID	Hourly PM_{10} Limit (lbs/hr)
Holcopet Unit 1	0.592
Holcoprill Unit 1	0.34
Holcoprill Unit 2	3.74
Holcosil Unit 1	0.59
Holcosil Unit 2	0.59
Holcosil Unit 3	0.59
Holcosil HCR	0.068
Holcobatch Unit A	5.094
Holcobatch Unit B	5.094

Compliance with the above limitations will render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.2.5 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from each Holcosil unit, each Holcoprill process, each Holcobatch unit, and Holcopet Unit 1 shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.2.6 HAPs [326 IAC 2-4.1]

Any change or modification that would increase pigment usage from the entire source such that the worst case single HAP usage increases to one thousand (1,000) tons per year or more, or total HAPs usage increases to 2,500 tons per year or more, may cause the source to become a major source of HAPs emissions, and shall require prior IDEM, OAQ approval.

D.2.7 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.8 Particulate Control

(a) In order to comply with Conditions D.2.4 and D.2.5, the dust collectors for particulate control shall be in operation and control emissions from each Holcosil unit, each Holcoprill process, each Holcobatch unit, and Holcopet Unit 1, at all times that these facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.9 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from Stack #27 and Stack #28 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

D.2.10 Parametric Monitoring

The Permittee shall record the pressure drop across dust collectors #27 and #28, at least once per day when any of the processes are in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 1.5 and 7.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.11 Broken or Failed Cartridge Detection

In the event that cartridge failure has been observed:

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.12 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain monthly records of the amount of each HAPs used.

(b) To document compliance with Condition D.2.9, the Permittee shall maintain records of visible emission notations of the stack exhaust from Stack #27 and Stack #28 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document compliance with Condition D.2.10, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in its daily record when the pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) To document compliance with Condition D.2.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Three (3) parts washers, capacity: 30 gallons, each. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

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

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

(a) Equip the cleaner with a cover;

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

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

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

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

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

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

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

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

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}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 of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

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

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

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Holland Colours Americas, Inc.
Source Address: 1501 Progress Drive, Richmond, Indiana 47374
Mailing Address: 1501 Progress Drive, Richmond, Indiana 47374
FESOP No.: F 177-16240-00051

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Holland Colours Americas, Inc.
Source Address: 1501 Progress Drive, Richmond, Indiana 47374
Mailing Address: 1501 Progress Drive, Richmond, Indiana 47374
FESOP No.: F 177-16240-00051

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

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

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

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

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Holland Colours Americas, Inc.
Source Address: 1501 Progress Drive, Richmond, Indiana 47374
Mailing Address: 1501 Progress Drive, Richmond, Indiana 47374
FESOP No.: F 177-16240-00051

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

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	**Holland Colours Americas, Inc.**
Source Location:	**1501 Progress Drive, Richmond, Indiana 47374 and 1500 NW O Street, Richmond, Indiana, 47374**
County:	**Wayne**
SIC Code:	**2865**
Operation Permit No.:	**F177-16240-00051**
Operation Permit Issuance Date:	**July 2, 2004**
Significant Permit Revision No.:	**177-26602-00051**
Permit Reviewer:	**Brian Williams**

On August 18, 2008, the Office of Air Quality (OAQ) had a notice published in the Palladium Item, Richmond, Indiana, stating that Holland Colours Americas, Inc. had applied for a Significant Permit Revision to a FESOP to modify and operate an existing emission unit located at the source. In addition, the source notified IDEM of an unpermitted emission unit, identified as one (1) Pre Weigh Unit, which was constructed and operated prior to receipt of the proper permit. Finally, Holland Colours Americas, Inc. requested changes to the existing emission unit descriptive information, PM10 emission limits, and visible emission notation and parametric monitoring requirements. The notice also stated that the OAQ proposed to issue Significant Permit Revision to a FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

(a) Page 1 of the permit incorrectly identified that this FESOP was being revised through a FESOP Administrative Amendment. Therefore, page 1 has been revised to indicate that this FESOP is being revised through a FESOP Significant Permit Revision.

(b) Condition D.2.12(c) has been revised to indicate that the source must maintain records of pressure drop once per day as indicated in the original Technical Support Document (TSD).

...

~~Third Administrative Amendment~~ **First Significant Permit Revision** No: 177-26602-00051	Pages Affected: Entire Permit

...

D.2.12 Record Keeping Requirements

...

(c) To document compliance with Condition D.2.10, the Permittee shall maintain records once per ~~shift~~ **day** of the pressure drop during normal operation. The Permittee shall include in its daily record when the pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

...

IDEM Contact

(a) Questions regarding this proposed FESOP can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5375) or toll free at 1-800-451-6027 extension (4-5375).

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	**Holland Colours Americas, Inc.**
Source Location:	**1501 Progress Drive, Richmond, Indiana 47374 and 1500 NW O Street, Richmond, Indiana, 47374**
County:	**Wayne**
SIC Code:	**2865**
Operation Permit No.:	**F177-16240-00051**
Operation Permit Issuance Date:	**July 2, 2004**
Significant Permit Revision No.:	**177-26602-00051**
Permit Reviewer:	**Brian Williams**

On May 28, 2008, the Office of Air Quality (OAQ) has received an application from Holland Colours Americas, Inc. related to a modification to an existing stationary colorant manufacturing plant.

Existing Approvals

The source was issued FESOP No. 177-16240-00051 on July 2, 2004. The source has since received the following approvals:

(a) First Administrative Amendment No. 177-20464-00051, issued on January 3, 2005; and

(b) Second Administrative Amendment No. 177-25806-00051, issued on February 25, 2008.

County Attainment Status

The source is located in Wayne County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed

pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Wayne County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

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

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

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

	Potential To Emit of the Entire Source Prior to Revision (tons/year)							
Process/Emission Unit	PM	PM10	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Holcobatch Unit 1	0.749	5.641	0	0	0	0	0	0
Holcobatch Unit 2	0.749	5.641	0	0	0	0	0	0
Holcobatch Unit 3	0.749	5.641	0	0	0	0	0	0
Holcobatch Unit 4	0.749	5.641	0	0	0	0	0	0
Holcobatch Unit 5	0.219	1.651	0	0	0	0	0	0
Holcobatch Unit 7	0.219	1.651	0	0	0	0	0	0
Holcobatch Unit 8	0.749	5.641	0	0	0	0	0	0
Holcomax	0.986	7.424	0	0	0	0	0	0
Holcoprill Unit 1	0.219	1.651	0	0	0	0	0	0
Holcoprill Unit 2	2.409	18.151	0	0	0	0	0	0
Holcosil Unit 1	0.38	2.86	0	0	0	0	0	0
Holcosil Unit 2	0.38	2.86	0	0	0	0	0	0

Process/Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)							
	PM	PM10	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Holcosil Unit 3	0.38	2.86	0	0	0	0	0	0
Holcosil HCR	0.044	0.372	0	0	0	0	0	0
Holcopet Unit 1	0.381	2.873	0	0	0	0	0	0
Holcopet Unit 2	0.381	2.873	0	0	0	0	0	0
Holcobatch Unit A	0.749	5.641	0	0	0	0	0	0
Holcobatch Unit B	0.749	5.641	0	0	0	0	0	0
Natural Gas Combustion	0.049	0.197	0.016	2.60	1.14	2.18	0.049	0.047 Hexane
Total PTE of Entire Source	**11.29**	**84.91**	**0.016**	**2.60**	**1.14**	**2.18**	**0.049**	**0.047**
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
negl. = negligible These emissions are based upon FESOP No. 177-16240-00051 and 177-25806-00051								

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

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Holland Colours Americas Inc. on May 28, 2008, requesting that the permit be updated to indicate the following:

(a) In the Second Administrative Amendment No. 177-25806-00051, issued on February 25, 2008, the source requested that the existing Holcobatch Unit 6 be removed from the permit. However, this unit was never removed from the source. As a result, the source has requested to modify and operate this emission unit, which will now be identified as Holcovinyl Unit 1. This emission unit will be added to Sections A.2 and D.1.

(b) The source notified IDEM of an unpermitted emission unit, identified as one (1) Pre Weigh Unit, which was constructed and operated prior to receipt of the proper permit. This emission unit will be added to Sections A.2 and D.1.

(c) The source requested that the SIC code found in Section A.1 be revised from 3999 to 2865.

(d) Sections A.2(a) and D.1(a): There are seven (7) Holcobatch production units, not eight (8).

(e) Sections A.2(a)(7) and D.1(a)(7): The Holcobatch production unit (#8) is not controlled by baghouse dust collector #6, which exhausts to Stack #6. This unit (#8) is controlled by cartridge dust collector #4, which exhausts to Stack #4. Baghouse dust collector #6 and Stack #6 are no longer in operation so all references to these units should be removed from the permit.

(f) Sections A.2(b) and D.1(b): The Holcomax production unit is not controlled by baghouse dust collector #5, which exhausts to Stack #5. This unit is controlled by cartridge dust collector #2 and #3, which exhausts to Stacks #2 and #3. Baghouse dust collector #5 and Stack #5 are no longer in operation so all references to these units should be removed from the permit.

(g) Sections A.2(c) and (d): The two Holcopet Mixers (#1 and #2) are not controlled by a portable dust collector. These units are controlled by cartridge dust collector #27, which exhaust to Stack #27.

(h) Sections A.2(g), (h), and D.2(g) and (h): The two Holcoprill production units are not controlled by three cartridge dust collects and do not exhaust to the indoors. These units are controlled by cartridge dust collector #27, which exhausts to Stacks #27.

(i) Sections D.1 and D.2: The existing building and new building are now identified as Building #1 and Building #2, respectively.

(j) The source requested that the permit be updated to indicate that the Holcopet mixer, identified as Holcopet Unit 1 has been moved from Building 1 to Building 2. As a result, the source has requested that this unit be removed from Section D.1 and added to Section D.2. In addition, the source notified IDEM that the Holcopet mixer, identified as Holcopet Unit 2 was never constructed. As a result, all references to Holcopet Unit 2 will be removed from the permit.

(k) The source requested that the existing PM10 emission limits found in Conditions D.1.1 and D.2.4 be revised. In addition, the source has accepted PM10 emission limits for the Holcovinyl Unit and Pre Weigh Unit. As a result, the entire source will continue to limit PM10 emissions to less than 100 tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable.

(l) The source requested that the permit be updated to indicate that the existing visible emission notation and parametric monitoring requirements found in Sections D.1 and D.2 be revised from "once per shift" to "once per day."

(m) The Holcomax process exhausts to Stacks #2 and #3 along with Holcobatch Units 1 through 7. Therefore, the Holcomax process should be included in Condition D.1.7(a) and Condition D.1.7(c) should be removed from the permit.

The following is a list of the new emission unit(s) and pollution control device(s):

(a) One (1) Holcovinyl unit, identified as Holcovinyl Unit 1, constructed in 2004, approved for modification in 2008, with a maximum capacity of 161 pounds per hour, controlled by cartridge dust collectors #2 and #3, and exhausting to Stacks #2 and #3.

The following is a list of the unpermitted emission unit(s):

(a) One (1) Pre Weigh Unit, identified as Pre Weigh Unit, constructed in 2006, with a maximum capacity of 688 pounds per hour, controlled by a portable dust collector, and exhausting to the indoors.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit.

IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	PTE of Proposed Revision (tons/year)							
	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Holcovinyl Unit 1	7.052	5.994	0	0	0	0	0	0
Pre Weigh Unit	30.134	25.614	0	0	0	0	0	0
Total PTE of Proposed Revision	**37.19**	**31.61**	0	0	0	0	0	0

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1(E)(i), because the revision involves the construction of new emission units with a potential to emit (PTE) greater than 25 tons of PM10 per year. In addition, this FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(2) because it involves adjustment to the existing source-wide emissions limitations to maintain the FESOP status of the source (see PTE of the Entire Source After The Issuance of the FESOP Revision Section).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Holcobatch Unit 1	0.749	~~5.641~~ **5.094**	0	0	0	0	0	0
Holcobatch Unit 2	0.749	~~5.641~~ **5.094**	0	0	0	0	0	0
Holcobatch Unit 3	0.749	~~5.641~~ **5.094**	0	0	0	0	0	0
Holcobatch Unit 4	0.749	~~5.641~~ **5.094**	0	0	0	0	0	0

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Holcobatch Unit 5	0.219	~~1.651~~ **1.49**	0	0	0	0	0	0
Holcobatch Unit 7	0.219	~~1.651~~ **1.49**	0	0	0	0	0	0
Holcobatch Unit 8	0.749	~~5.641~~ **5.094**	0	0	0	0	0	0
Holcomax	0.986	~~7.424~~ **6.70**	0	0	0	0	0	0
Holcovinyl Unit 1	**0.705**	**4.80**	**0**	**0**	**0**	**0**	**0**	**0**
Pre Weigh Unit	**3.013**	**17.93**	**0**	**0**	**0**	**0**	**0**	**0**
Holcoprill Unit 1	0.219	~~1.651~~ **1.49**	0	0	0	0	0	0
Holcoprill Unit 2	2.409	~~18.151~~ **16.38**	0	0	0	0	0	0
Holcosil Unit 1	0.38	~~2.86~~ **2.58**	0	0	0	0	0	0
Holcosil Unit 2	0.38	~~2.86~~ **2.58**	0	0	0	0	0	0
Holcosil Unit 3	0.38	~~2.86~~ **2.58**	0	0	0	0	0	0
Holcosil HCR	0.044	~~0.372~~ **0.298**	0	0	0	0	0	0
Holcopet Unit 1	0.381	~~2.873~~ **2.593**	0	0	0	0	0	0
~~Holcopet Unit 2~~	~~0.381~~	~~2.873~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~
Holcobatch Unit A	0.749	~~5.641~~ **5.094**	0	0	0	0	0	0
Holcobatch Unit B	0.749	~~5.641~~ **5.094**	0	0	0	0	0	0
Natural Gas Combustion	0.049	0.197	0.016	2.60	1.14	2.18	0.049	0.047 Hexane
Total PTE of Entire Source	~~11.29~~ **14.63**	~~84.91~~ **96.78**	0.016	2.60	1.14	2.18	0.049	0.047
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

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

is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/Emission Unit	**Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)**							
	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Holcobatch Unit 1	0.749	5.094	0	0	0	0	0	0
Holcobatch Unit 2	0.749	5.094	0	0	0	0	0	0
Holcobatch Unit 3	0.749	5.094	0	0	0	0	0	0
Holcobatch Unit 4	0.749	5.094	0	0	0	0	0	0
Holcobatch Unit 5	0.219	1.49	0	0	0	0	0	0
Holcobatch Unit 7	0.219	1.49	0	0	0	0	0	0
Holcobatch Unit 8	0.749	5.094	0	0	0	0	0	0
Holcomax	0.986	6.70	0	0	0	0	0	0
Holcovinyl Unit 1	0.705	4.80	0	0	0	0	0	0
Pre Weigh Unit	3.013	17.93	0	0	0	0	0	0
Holcoprill Unit 1	0.219	1.49	0	0	0	0	0	0
Holcoprill Unit 2	2.409	16.38	0	0	0	0	0	0
Holcosil Unit 1	0.38	2.58	0	0	0	0	0	0
Holcosil Unit 2	0.38	2.58	0	0	0	0	0	0
Holcosil Unit 3	0.38	2.58	0	0	0	0	0	0
Holcosil HCR	0.044	0.298	0	0	0	0	0	0
Holcopet Unit 1	0.381	2.593	0	0	0	0	0	0
Holcobatch Unit A	0.749	5.094	0	0	0	0	0	0
Holcobatch Unit B	0.749	5.094	0	0	0	0	0	0
Natural Gas Combustion	0.049	0.197	0.016	2.60	1.14	2.18	0.049	0.047 Hexane
Total PTE of Entire Source	**14.63**	**96.78**	**0.016**	**2.60**	**1.14**	**2.18**	**0.049**	**0.047**
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

(1) The following new and existing emission units shall have their PM_{10} emissions limited such that they shall not exceed the hourly PM10 emission limits specified in the following table: (Note: this revision required a decrease to the existing hourly PM_{10} emission limits to maintain the FESOP status of the source.)

Unit ID	Hourly PM_{10} Limit (lbs/hr)
Holcobatch Unit 1	~~1.288~~ **1.163**
Holcobatch Unit 2	~~1.288~~ **1.163**
Holcobatch Unit 3	~~1.288~~ **1.163**
Holcobatch Unit 4	~~1.288~~ **1.163**
Holcobatch Unit 5	~~0.377~~ **0.34**
Holcobatch Unit 7	~~0.377~~ **0.34**
Holcobatch Unit 8	~~1.288~~ **1.163**
Holcomax	~~1.695~~ **1.53**
Holcopet Unit 1	~~0.656~~ **0.592**
~~Holcopet Unit 2~~	~~0.656~~
Holcovinyl Unit 1	**1.095**
Pre Weigh Unit	**4.094**
Holcoprill Unit 1	~~0.377~~ **0.34**
Holcoprill Unit 2	~~4.144~~ **3.74**
Holcosil Unit 1	~~0.653~~ **0.59**
Holcosil Unit 2	~~0.653~~ **0.59**
Holcosil Unit 3	~~0.653~~ **0.59**
Holcosil HCR	**0.068**
Holcobatch Unit A	~~5.641~~ **5.094**
Holcobatch Unit B	~~5.641~~ **5.094**

Unit ID	Hourly PM_{10} Limit (lbs/hr)
Holcobatch Unit 1	1.163
Holcobatch Unit 2	1.163
Holcobatch Unit 3	1.163
Holcobatch Unit 4	1.163
Holcobatch Unit 5	0.34
Holcobatch Unit 7	0.34
Holcobatch Unit 8	1.163
Holcomax	1.53
Holcopet Unit 1	0.592
Holcovinyl Unit 1	1.095
Pre Weigh Unit	4.094
Holcoprill Unit 1	0.34
Holcoprill Unit 2	3.74
Holcosil Unit 1	0.59
Holcosil Unit 2	0.59
Holcosil Unit 3	0.59
Holcosil HCR	0.068
Holcobatch Unit A	1.163
Holcobatch Unit B	1.163

Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) PSD Minor Source
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this proposed revision).

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

Compliance Assurance Monitoring (CAM)

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

(a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the holcovinyl and pre weigh units are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

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

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

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

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

(g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

<u>Holcovinyl and Pre Weigh Units</u>

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are not applicable to the Holcovinyl and Pre Weigh Units because they are subject to a more stringent particulate matter limit under 326 IAC 6.5 (Particulate Matter Limitations Except Lake County).

(b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This stationary colorant manufacturing plant is located in Wayne County. This source is not specifically listed in 326 IAC 6.5-10 and has an unlimited potential to emit greater than one hundred (100) tons of particulate matter per year. Pursuant to 6.5-1-2(a), PM emissions from the Holcovinyl Unit and the Pre Weigh Unit shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.

In order to comply with these limits, particulate from the Holcovinyl and Pre Weigh Units shall be controlled by dust collectors at all times that these units are in operation.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No. 177-16240-00051 on July 2, 2004.

Proposed Changes

(a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(1) The SIC code found in Section A.1 has been revised from 3999 to 2865.

(2) Sections A.2(a) and D.1(a) have been revised to indicate that there are seven (7) Holcobatch production units, not eight (8).

(3) Sections A.2(a)(7) and D.1(a)(7) have been revised to indicate that the Holcobatch production unit (#8) is not controlled by baghouse dust collector #6, which exhausts to Stack #6. This unit (#8) is controlled by cartridge dust collector #4, which exhausts to Stack #4. Baghouse dust collector #6 and Stack #6 are no longer in operation so all references to these units should be removed from the permit.

(4) Sections A.2(b) and D.1(b) have been revised to indicate that the Holcomax production unit is not controlled by baghouse dust collector #5, which exhausts to Stack #5. This unit is controlled by cartridge dust collector #2 and #3, which exhausts to Stacks #2 and #3. Baghouse dust collector #5 and Stack #5 are no longer in operation so all references to these units should be removed from the permit.

(5) Sections A.2(c) and (d) have been revised to indicate that the two Holcopet Mixers (#1 and #2) are not controlled by a portable dust collector. These units are controlled by cartridge dust collector #27, which exhaust to Stack #27.

(6) Sections A.2(g), (h), and D.2(g) and (h) have been revised to indicate that the two Holcoprill production units are not controlled by three cartridge dust collects and do not exhaust to the indoors. These units are controlled by cartridge dust collector #27, which exhausts to Stacks #27.

(7) Sections D.1 and D.2 have been revised to indicate that the existing building and new building are now identified as Building #1 and Building #2, respectively.

(8) The Holcovinyl Unit and Pre Weigh Unit emission descriptions and applicable requirements have been added to Sections A.2 and D.1.

(9) The existing Holcopet mixers, identified as Holcopet Unit 1 has been moved from Building

1 to Building 2. Therefore, all references and existing requirements to this unit have been removed from Section D.1 (Building #1) and added to Section D.2 (Building #2). In addition, the source notified IDEM that the Holcopet mixer, identified as Holcopet Unit 2 was never constructed. As a result, all references to Holcopet Unit 2 have been removed from the permit.

(10) The existing PM10 emission limits found in Conditions D.1.1 and D.2.4 have been revised to allow for the addition of the Holocovinyl Unit and Pre Weight Unit. In addition, the source has accepted PM10 emission limits for the Holcovinyl Unit and the Pre Weigh Unit. As a result, the entire source will continue to limit PM10 emissions to less than 100 tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable.

(11) On August 10, 2005, 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations) was repealed and replaced by 326 IAC 6.5 (Particulate Matter Limitations Except Lake County). Therefore, Conditions D.1.2 and D.2.5 - Particulate, have been revised to indicate that the source is subject to 326 IAC 6.5 and no longer subject to 326 IAC 6-1-2.

(12) The existing visible emission notation and parametric monitoring requirements found in Conditions D.1 and D.2 have been revised from "once per shift" to "once per day."

(13) The Holcomax process exhausts to Stacks #2 and #3 along with Holcobatch Units 1 through 7. Therefore, the Holcomax process has been included in Condition D.1.7(a) and Condition D.1.7(c) has been removed from the permit.

...

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

The Permittee owns and operates a stationary colorant manufacturing source.

SIC Code: ~~3999~~ **2865**

...

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

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

(a) ~~Eight~~ **Seven** (~~8~~**7**) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing, and spraying to form beads (the product):

...

(7) Unit 8, controlled by ~~baghouse~~ **cartridge** dust collector #~~6~~**4**, exhausting to Stack #~~6~~**4**, capacity: 342 pounds per hour. ~~This unit also has a backup baghouse dust collector, designated as #4, exhausting to Stack #4, capacity: 342 pounds per hour.~~

(b) One (1) Holcomax production unit, ~~equipped with baghouse~~ **controlled by cartridge** dust collector**s** #~~5~~**2 and #3**, exhausting to Stack**s** #~~5~~**2 and #3**, capacity: 225 pounds per hour.

(c) One (1) Holcovinyl unit, identified as Holcovinyl Unit 1, constructed in 2004, approved for modification in 2008, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 161 pounds per hour.

(d) One (1) Pre Weigh Unit, identified as Pre Weigh Unit, constructed in 2006, with a maximum capacity of 688 pounds per hour, controlled by a portable dust collector, and exhausting to the indoors.

(~~c~~**e**) One (1) Holcopet mixer, identified as Holcopet Unit 1, controlled by ~~a portable~~ **cartridge** dust collector **#27,** which exhausts ~~indoors~~ **to Stack #27**, capacity: 247 pounds per hour.

(~~d~~) ~~One (1) Holcopet mixer, identified as Holcopet Unit 2, controlled by a portable dust collector which exhausts indoors, capacity: 247 pounds per hour.~~

(~~e~~**f**) Three (3) Holcosil units, identified as #1, #2 and #3, controlled by cartridge dust collector #28, installed in 2008, which exhausts ~~outdoors~~ **to Stack #28**, capacity: 247 pounds per hour, each.

(~~f~~**g**) One (1) Holcosil unit, **identified as Holcosil HCR,** approved for construction in 2008, controlled by cartridge dust collector #28, which exhausts ~~outdoors~~ **to Stack #28**, capacity: 10 pounds per hour.

(~~g~~**h**) One (1) Holcoprill process, identified as Unit 1, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by ~~three (3)~~ **cartridge** dust collector~~s~~ **#27,** which exhausts ~~indoors~~ **to Stack #27**, capacity: 100 pounds per hour.

(~~h~~**i**) One (1) Holcoprill process, identified as Unit 2, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by ~~three (3)~~ **cartridge** dust collector~~s~~ **#27,** which exhausts ~~indoors~~ **to Stack #27**, capacity: 1,100 pounds per hour.

(~~i~~**j**) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):

...

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: ~~Existing~~ Building **#1**

(a) ~~Eight~~ **Seven** (~~8~~**7**) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing, and spraying to form beads (the product):

...

(7) Unit 8, controlled by ~~baghouse~~ **cartridge** dust collector #~~6~~**4**, exhausting to Stack #~~6~~**4**, capacity: 342 pounds per hour~~. This unit also has a backup baghouse dust collector, designated as #4, exhausting to Stack #4, capacity: 342 pounds per hour~~.

(b) One (1) Holcomax production unit, ~~equipped with baghouse~~ **controlled by cartridge** dust collector**s** #~~5~~**2 and #3**, exhausting to Stack**s** #~~5~~**2 and #3**, capacity: 225 pounds per hour.

~~(c) One (1) Holcopet mixer, identified as Holcopet Unit 1, controlled by a portable dust collector which exhausts indoors, capacity: 248 pounds per hour.~~

~~(d) One (1) Holcopet mixer, identified as Holcopet Unit 2, controlled by a portable dust collector which exhausts indoors, capacity: 248 pounds per hour.~~

(c) One (1) Holcovinyl unit, identified as Holcovinyl Unit 1, constructed in 2004, approved for modification in 2008, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 161 pounds per hour.

(d) One (1) Pre Weigh Unit, identified as Pre Weigh Unit, constructed in 2006, with a maximum capacity of 688 pounds per hour, controlled by a portable dust collector, and exhausting to the indoors.

...

D.1.1 Particulate Matter (PM10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM_{10} emissions shall not exceed the hourly rates expressed in the following table:

Unit ID	Hourly PM_{10} Limit (lbs/hr)
Holcobatch Unit 1	~~1.288~~ **1.163**
Holcobatch Unit 2	~~1.288~~ **1.163**
Holcobatch Unit 3	~~1.288~~ **1.163**
Holcobatch Unit 4	~~1.288~~ **1.163**
Holcobatch Unit 5	~~0.377~~ **0.34**
Holcobatch Unit 7	~~0.377~~ **0.34**
Holcobatch Unit 8	~~1.288~~ **1.163**
Holcomax	~~1.695~~ **1.53**
~~Holcopet Unit 1~~	~~0.656~~
~~Holcopet Unit 2~~	~~0.656~~
Holcovinyl Unit 1	**1.095**
Pre Weigh Unit	**4.094**

...

D.1.2 Particulate [326 IAC ~~6-1-2(a)~~ **6.5-1-2**]

Pursuant to 326 IAC ~~6-1-2(a)~~ **6.5-1-2** (~~Nonattainment Area Particulate Limitations~~ **Particulate Matter Limitations Except Lake County**), particulate matter (PM) emissions from each Holcobatch Unit, the Holcomax Unit, ~~and each Holcopet Unit~~ **the Holcovinyl Unit, and the Pre Weigh Unit** shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

...

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.1 and D.1.2, the dust ~~collection equipment~~ **collectors** for particulate control shall be in operation and control emissions from each Holcobatch Unit, the Holcomax Unit, ~~and each Holcopet Unit~~ **the Holcovinyl Unit, and the Pre Weigh Unit** at all times that these facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the Holcobatch Units and the Holcomax process stack exhausts (Stacks #2, #3, **and #4** ~~#5 and #6~~) shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

(e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and~~

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

D.1.7 Parametric Monitoring

(a) The Permittee shall record the ~~total static~~ pressure drop across the ~~cartridge~~ dust collectors used in conjunction with Holcobatch Units 1 through 7**, and the Holcomax process**, at least once per ~~shift~~ **day** when any of the processes are in operation. When for any one reading, the pressure drop across the ~~filter~~ **dust collectors** is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation and Implementation~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

(b) The Permittee shall record the ~~total static~~ pressure drop across the ~~baghouse~~ **dust collector** used in conjunction with the Holcobatch Unit 8, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the ~~baghouse~~ **dust collector** is outside the normal range of 1.0 and 7.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation and Implementation~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

~~(c) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Holcomax process, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.~~

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge and Other Instrument Specifications~~ **Instrument Specifications**, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

~~D.1.8 Baghouse and Cartridge Filter Inspections~~

~~An inspection shall be performed each calendar quarter of all bags and cartridges controlling the Holcobatch Units and the Holcomax process. Inspections required by this condition shall not be performed in consecutive months. All defective bags and cartridges shall be replaced.~~

D.1.~~9~~**8** Broken or Failed Bag Detection

In the event that bag failure has been observed:

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment units, if failure is indicated by a significant drop in the pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.~~10~~**9** Record Keeping Requirements

...

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the Holcobatch Units and the Holcomax process stack exhausts (Stacks #2, #3, ~~#5~~ and ~~#6~~ **#4**) once per ~~shift~~ **day**. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records once per ~~shift~~ **day** of the ~~total static~~ pressure drop during normal operation. **The Permittee shall include in its daily record when the pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that**

day).

~~(d) To document compliance with Condition D.1.8 the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.~~

(~~c~~**d**) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: ~~New~~ Building **#2**

(~~c~~**e**) **One (1) Holcopet mixer, identified as Holcopet Unit 1, controlled by cartridge dust collector #27, which exhausts to Stack #27, capacity: 247 pounds per hour.**

(~~e~~**f**) Three (3) Holcosil units, identified as #1, #2 and #3, controlled by **cartridge** dust collector #28, installed in 2008, which exhausts ~~outdoors~~ **to Stack #28**, capacity: 247 pounds per hour, each.

(~~f~~**g**) One (1) Holcosil unit, **identified as Holcosil HCR,** approved for construction in 2008, controlled by **cartridge dust** collector #28, which exhausts ~~outdoors~~ **to Stack #28**, capacity: 10 pounds per hour.

(~~g~~**h**) One (1) Holcoprill process, identified as Unit 1, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by ~~three (3)~~ **cartridge** dust collector~~s~~ **#27,** which exhausts ~~indoors~~ **to Stack #27**, capacity: 100 pounds per hour.

(~~h~~**i**) One (1) Holcoprill process, identified as Unit 2, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by ~~three (3)~~ **cartridge** dust collector~~s~~ **#27,** which exhausts ~~indoors~~ **to Stack #27**, capacity: 1,100 pounds per hour.

(~~i~~**j**) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):

...

...

D.2.4 Particulate Matter (PM_{10}) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM_{10} emissions shall not exceed the hourly rates expressed in the following table:

Unit ID	Hourly PM_{10} Limit (lbs/hr)
Holcopet Unit 1	~~0.656~~ **0.592**
Holcoprill Unit 1	~~0.377~~ **0.34**
Holcoprill Unit 2	~~4.144~~ **3.74**
Holcosil Unit 1	~~0.653~~ **0.59**
Holcosil Unit 2	~~0.653~~ **0.59**
Holcosil Unit 3	~~0.653~~ **0.59**
Holcosil HCR	**0.068**

Holcobatch Unit A	~~5.641~~ **5.094**
Holcobatch Unit B	~~5.641~~ **5.094**

...

D.2.5 Particulate [326 IAC ~~6-1-2(a)~~ **6.5-1-2**]

Pursuant to 326 IAC 6-1-2(a) **6.5-1-2** (~~Nonattainment Area Particulate Limitations~~ **Particulate Matter Limitations Except Lake County**), particulate matter (PM) emissions from each Holcosil unit, each Holcoprill process, ~~and~~ each Holcobatch unit**, and Holcopet Unit 1** shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

...

D.2.8 Particulate Control

(a) In order to comply with Conditions D.2.4 and D.2.5, the dust collectors for particulate control shall be in operation and control emissions from each Holcosil unit, each Holcoprill process, ~~and~~ each Holcobatch unit, **and Holcopet Unit 1,** at all times that these facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

...

D.2.9 Visible Emissions Notations

(a) Visible emission notations of the ~~Holcobatch Units A and B~~ stack exhaust **from** ~~(~~Stack #27~~),~~ ~~Holocosil units #1, #2, #3,~~ and ~~additional Holocosil unit stack exhaust (~~Stack #28~~)~~ shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

(e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.~~ **If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

D.2.10 Parametric Monitoring

The Permittee shall record the ~~total static~~ pressure drop across ~~the cartridge~~ dust collector**s #27 and #28** ~~used in conjunction with Holcobatch Units A and B, and cartridge dust collector #28 used in conjunction with Holocosil units #1, #2, #3, and additional Holocosil unit~~, at least once per ~~shift~~ **day** when any of the processes are in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 1.5 and 7.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation and Implementation~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge~~

~~and Other Instrument Specifications~~ **Instrument Specifications**, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

~~D.2.11 Dust Collector Inspections~~

~~An inspection shall be performed each calendar quarter of all cartridges controlling the Holcobatch Units A and B, Holocosil units #1, #2, #3, and additional Holocosil unit. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.~~

D.2.1~~2~~**1** Broken or Failed Cartridge Detection

In the event that cartridge failure has been observed:

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after cartridge failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment dust collectors, if failure is indicated by a significant drop in the dust collector pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if cartridge failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.13~~2~~ Record Keeping Requirements

...

(b) To document compliance with Condition D.2.9, the Permittee shall maintain records of visible emission notations of the ~~Holcobatch Units A and B~~ stack exhaust **from** ~~(~~Stack #27~~),~~ ~~Holocosil units #1, #2, #3,~~ and ~~additional Holocosil unit exhaust (~~Stack #28~~)~~ once per ~~shift~~ **day**. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**

(c) To document compliance with Condition D.2.10, the Permittee shall maintain records once per ~~shift~~ **day** of the ~~total static~~ pressure drop during normal operation. **The Permittee shall include in its daily record when the pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**

~~(d) To document compliance with Condition D.2.11, the Permittee shall maintain records of the results of the inspections required under Condition D.2.11.~~

(~~c~~**d**) To document compliance with Condition D.2.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

...

(b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(1) IDEM realizes that the specifications of original Condition C.13 – Pressure Gauge and Other Instrument Specifications, can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the language in original Condition C.13 has been revised.

...

~~C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]~~

~~(a) Whenever a condition in this permit requires the measurement of pressure 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 (∀2%) of full scale reading.~~

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

...

(2) IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan (original Condition C.15). The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Therefore, original Condition C.15 for the "Compliance Response Plan" has been replaced by Condition C.15 for the "Response to Excursions or Exceedances". The Section D conditions that refer to this condition have been revised to reflect the new condition title (Refer to the changes in the section of Proposed Changes).

...

~~C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]~~

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

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (c) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

...

(3) For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. Therefore, a requirement has been added to Conditions D.1.5 and D.2.8 – Particulate Control, requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition (see changes above).

(4) IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit (original Conditions D.1.8 and D.2.11). In addition, the requirement to keep records of the inspections have been removed (original Conditions D.1.10(d) and D.2.13(d)) (see changes above).

(5) Paragraph (a) of Conditions D.1.8 and D.2.11 – Broken or Failed Bag Detection (original Conditions D.1.9 and D.2.12) have been deleted and replaced with a conditions specific to single compartment baghouses which control emissions from continuously operating and batch processes (see changes above).

(6) Conditions D.1.9(b) and (c) and D.2.12(b) and (c) – Record Keeping Requirements for Visible Emission Notations and Parametric Monitoring (original Conditions D.1.10 and D.2.13) are revised to clarify that the Permittee needs to make a record of some sort every day. The intent of Record Keeping Requirements for Visible Emission Notations

and Parametric Monitoring is that the Permittee needs to make a record of some sort every day. An example for Visible Emission Notations would be "normal" or "abnormal". Additionally, if Visible Emission Notations were not done on a particular day, the Permittee needs to specify the reason why the observation was not done. An example of this record would be "the unit was not operating" or "the unit was venting indoors" (see changes above).

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 28, 2008.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 177-26602-00051. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5375) or toll free at 1-800-451-6027 extension (4-5375)

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations
New Emission Units
Unlimited PM/PM10 Emissions

Company Name: Holland Colors Americas, Inc.
Address City IN Zip: 1501 Progress Drive, Richmond, IN 47374
Permit Number: 177-26602-00051
Reviewer: Brian Williams

				Uncontrolled					Controlled			
Unit ID	Pigment Usage Rate (lbs/hr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM Emission Rate (lbs/hr)	PM Emission Rate (tons/yr)	PM10 Emission Rate (lbs/hr)	PM10 Emission Rate (tons/yr)	Control Efficiency (%)	PM Emission Rate (lbs/hr)	PM Emission Rate (tons/yr)	PM10 Emission Rate (lbs/hr)	PM10 Emission Rate (tons/yr)
Holcovinyl Unit 1	161.0	20.0	17.0	1.61	7.05	1.37	5.99	90.00%	0.161	0.71	0.137	0.60
Pre Weigh Unit	688.0	20.0	17.0	6.88	30.13	5.85	25.61	90.00%	0.688	3.01	0.585	2.56
Total					**37.19**		**31.61**			**3.72**		**3.16**

METHODOLOGY
Uncontrolled Emission Rate (lbs/hr) = Pigment Throughput (lbs/hr) x 1 ton/2000 lbs x EF (lbs/ton)
Uncontrolled Emission Rate (tons/yr) = Throughput (lbs/hr) x 1 ton/2000 lbs x EF (lbs/ton) x 8760 (hrs/yr) / 2000 (lbs/ton)
Controlled Emission Rate (lbs/hr) = Uncontrolled Emission Rate (lbs/hr) x (1-Control Eff)
Controlled Emission Rate (tons/yr) = Uncontrolled Emission Rate (tons/yr) x (1-Control Eff)
Emission factors from FIRE 6.24 (SCC 3-01-014-02)

Appendix A: Emissions Calculations
Summary of Emissions

Company Name: Holland Colors Americas, Inc.
Address City IN Zip: 1501 Progress Drive, Richmond, IN 47374
Permit Number: 177-26602-00051
Reviewer: Brian Williams

Potential to Emit of Entire Source After Issuance (tons/yr)									
Facility/Operation	**PM**	**PM10**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Single HAP**	
Holcobatch Unit 1	0.749	5.094	0.0	0.0	0.0	0.0	0.0	0.0	
Holcobatch Unit 2	0.749	5.094	0.0	0.0	0.0	0.0	0.0	0.0	
Holcobatch Unit 3	0.749	5.094	0.0	0.0	0.0	0.0	0.0	0.0	
Holcobatch Unit 4	0.749	5.094	0.0	0.0	0.0	0.0	0.0	0.0	
Holcobatch Unit 5	0.219	1.49	0.0	0.0	0.0	0.0	0.0	0.0	
Holcobatch Unit 7	0.219	1.49	0.0	0.0	0.0	0.0	0.0	0.0	
Holcobatch Unit 8	0.749	5.094	0.0	0.0	0.0	0.0	0.0	0.0	
Holcomax	0.986	6.70	0.0	0.0	0.0	0.0	0.0	0.0	
Holcoprill Unit 1	0.219	1.49	0.0	0.0	0.0	0.0	0.0	0.0	
Holcoprill Unit 2	2.409	16.38	0.0	0.0	0.0	0.0	0.0	0.0	
Holcosil Unit 1	0.38	2.58	0.0	0.0	0.0	0.0	0.0	0.0	
Holcosil Unit 2	0.38	2.58	0.0	0.0	0.0	0.0	0.0	0.0	
Holcosil Unit 3	0.38	2.58	0.0	0.0	0.0	0.0	0.0	0.0	
Holcosil HCR	0.044	0.298	0.0	0.0	0.0	0.0	0.0	0.0	
Holcopet Unit 1	0.381	2.593	0.0	0.0	0.0	0.0	0.0	0.0	
Holcobatch Unit A	0.749	5.094	0.0	0.0	0.0	0.0	0.0	0.0	
Holcobatch Unit B	0.749	5.094	0.0	0.0	0.0	0.0	0.0	0.0	
Holcovinyl Unit 1	0.705	4.80	0.0	0.0	0.0	0.0	0.0	0.0	
Pre Weigh Unit	3.013	17.93	0.0	0.0	0.0	0.0	0.0	0.0	
Natural Gas Combustion	0.049	0.197	0.016	2.6	1.14	2.18	0.049	0.047	Hexane
Total	**14.63**	**96.78**	**0.016**	**2.600**	**1.140**	**2.180**	**0.049**	**0.047**	**Hexane**