



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: April 16, 2009

RE: Gaska Tape, Inc. / 039-26891-00077

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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April 16, 2009

Mr. Greg Szabo
Gaska Tape, Inc.
1810 West Lusher Avenue
Elkhart, Indiana 46517

Re: 039-26891-00077
First Significant Permit Modification to
Part 70 Renewal No.: T 039-23298-00077

Dear Mr. Szabo,

Gaska Tape, Inc. was issued Part 70 Operating Permit Renewal No. T 039-23298-00077 on February 12, 2008 for the operation of a stationary foamed plastic adhesive tape manufacturing plant. A letter requesting changes to this permit was received on August 20, 2008. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of emission unit description changes, revised emission calculations, and the addition of an alternate operating scenario allowing the use of an existing regenerative thermal oxidizer to comply with the provisions of 326 IAC 8-2-5 (Paper Coating Operations) for the one (1) Silicone/Adhesive Line (SAL) as allowed by the provisions of 326 IAC 8-1-2(a)(2).

The regenerative thermal oxidizer (RTO) is not a new emission unit and there are no new or modified emission units included in this permit modification. Therefore, this permit modification is not subject to 326 IAC 2-7-10.5. All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit as modified.

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 Angela Taylor, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Angela Taylor or extension 4-6543, or dial (317) 234-6543.

Sincerely,

Chrystal A. Wagner, Section Chief
Permits Branch
Office of Air Quality

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector
Compliance Data Section
Administrative and Development

Attachments:
Significant Permit Modification, 039-26891-00077
Attachment A
Technical Support Document (TSD)
Emission Calculations

APT



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY Gaska Tape, Inc. 1810 West Lusher Avenue Elkhart, Indiana 46517

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

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

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

Operation Permit No.: T 039-23298-00077	
Original signed by: Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 12, 2008 Expiration Date: February 12, 2013

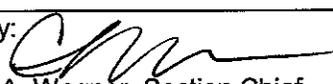
Significant Permit Modification No.: T039-26891-00077	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 16, 2009 Expiration Date: February 12, 2013

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a foamed plastic adhesive tape manufacturing plant.

Source Address:	1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address:	1810 West Lusher Avenue, Elkhart, Indiana 46517
General Source Phone Number:	574-294-5431
SIC Code:	3086
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program 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 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) Plastisol Processing Line, identified as PPL#1, utilizing knife-edge and thin roll coating, coating PVC foam, constructed in 1965, reconstructed in 1985, capacity: 194 gallons of coating/adhesive per hour and 4,131 pounds of PVC foam per hour, utilizing a natural gas-fired regenerative thermal oxidizer, identified as RTO, exhausting through Stacks 1 - 6 and Stack 22. Under NSPS RR, this is considered an affected coating line.
- (b) One (1) Plastisol Processing Line, identified as PPL#2, utilizing knife-edge and thin roll coating, coating PVC foam, constructed in 1995, capacity: 309 gallons of coating/adhesive per hour and 4,131 pounds of PVC foam per hour, utilizing a natural gas-fired regenerative thermal oxidizer, identified as RTO, exhausting through Stacks 7 - 9 and Stack 22. Under NSPS RR, this is considered an affected coating line.
- (c) One (1) Custom Lamination Line, identified as CLL-1, utilizing thin roll coating application, constructed in 1999, capacity: 23.5 gallons of coating/adhesive per hour, exhausting through Stack 23.
- (d) One (1) Silicone/Adhesive Line, identified as SAL, utilizing thin roll-coating, constructed in 1995, capacity: 3,867 pounds of paper coated per hour, utilizing a natural gas-fired regenerative thermal oxidizer, identified as RTO, exhausting through Stacks 11 and Stack 22. Under NSPS RR, this is considered an affected coating line.
- (e) One (1) Prototype Line, identified as PTL, utilizing knife-edge coating, with the capability to use thin roll coating, constructed in 1994, capacity: 415 pounds of Plastisol per hour, 39 pounds of adhesives per hour or 32 pounds of paper coated per hour, exhausting through Stacks 15 and 24 - 26. Under NSPS RR, this is considered an affected coating line.
- (f) Degreasing operations, consisting of five (5) parts washers with closable lids and recirculation pumps, and hand degreasing activities.

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

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

- (a) Cleaners and solvents characterized as follows: [326 IAC 2-2]
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T 039-23298-00077, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that,

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance and Enforcement 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, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, Compliance and Enforcement Branch, Office of Air Quality upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

And

Northern Regional Office
300 N. Michigan Street, Suite 450
South Bend, Indiana 46601-1253

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T 039-23298-00077 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

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

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

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

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 .

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ 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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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]

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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 two hundred sixty (260) linear feet on pipes or one hundred sixty (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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least seventy-five hundredths (0.75) cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on April 25, 2002.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (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) If there is a "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit other than a project at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr)), the Permittee shall comply with the following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

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

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

Indiana Department of Environmental Management
Compliance and Enforcement 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the record keeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

C.17 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

FACILITY OPERATION CONDITIONS

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

- (a) One (1) Plastisol Processing Line, identified as PPL#1, utilizing knife-edge and thin roll coating, coating PVC foam, constructed in 1965, reconstructed in 1985, capacity: 194 gallons of coating/adhesive per hour and 4,131 pounds of PVC foam per hour, utilizing a natural gas-fired regenerative thermal oxidizer, identified as RTO, exhausting through Stacks 1 - 6 and Stack 22. Under NSPS RR, this is considered an affected coating line.
- (b) One (1) Plastisol Processing Line, identified as PPL#2, utilizing knife-edge and thin roll coating, coating PVC foam, constructed in 1995, capacity: 309 gallons of coating/adhesive per hour and 4,131 pounds of PVC foam per hour, utilizing a natural gas-fired regenerative thermal oxidizer, identified as RTO, exhausting through Stacks 7 - 9 and Stack 22. Under NSPS RR, this is considered an affected coating line.
- (c) One (1) Custom Lamination Line, identified as CLL-1, utilizing thin roll coating application, constructed in 1999, capacity: 23.5 gallons of coating/adhesive per hour, exhausting through Stack 23.
- (d) One (1) Silicone/Adhesive Line, identified as SAL, utilizing thin roll-coating, constructed in 1995, capacity: 3,867 pounds of paper coated per hour, utilizing a natural gas-fired regenerative thermal oxidizer, identified as RTO, exhausting through Stacks 11 and Stack 22. Under NSPS RR, this is considered an affected coating line.
- (e) One (1) Prototype Line, identified as PTL, utilizing knife-edge coating, with the capability to use thin roll coating, constructed in 1994, capacity: 415 pounds of Plastisol per hour, 39 pounds of adhesives per hour or 32 pounds of paper coated per hour, exhausting through Stacks 15 and 24 - 26. Under NSPS RR, this is considered an affected coating line.
- (f) Degreasing operations, consisting of five (5) parts washers with closable lids and recirculation pumps, and hand degreasing activities.

Insignificant Activities

- (a) Cleaners and solvents characterized as follows: [326 IAC 2-2]
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

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

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

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

Pursuant to 326 IAC 8-2-5, no owner or operator of a coating line subject to this requirement (one (1) Prototype Line, identified as PTL; one (1) Custom Lamination Line, identified as CLL-1; one (1) Plastisol Processing Line, identified as PPL#2; and one (1) Plastisol Processing Line, identified as PPL#1) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5][326 IAC 8-1-2]

- (a) Alternate Operating Scenario 1
Pursuant to 326 IAC 8-2-5, the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from one (1) Silicone/Adhesive Line, identified as SAL.
- (b) Alternate Operating Scenario 2
Pursuant to 326 IAC 8-1-2(b), VOC emissions from the one (1) Silicone/Adhesive Line, identified as SAL shall be limited to less than 4.79 pounds of VOC per gallon of coating solids when coatings are applied in the SAL which have a VOC content in excess of 2.9 pounds VOC per gallon of coating less water. This equivalent limit was determined by using the following equation:

$$E = \frac{L}{\left(1 - \frac{L}{D}\right)}$$

Where,

E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.

L = Applicable emission limit from Article 8 in pounds of VOC per gallon of coating less water (2.9 lbs/gal.).

D = Baseline solvent density of VOC in the coating, which is equal to 7.36 pounds of VOC per gallon of solvent.

$$E = 2.9 / (1 - 2.9 / 7.36) = 4.78565 \text{ lbs VOC / gallon of solids}$$

Therefore, the equivalent VOC emission limit for the SAL is 4.79 lbs VOC / gallon of solids.

When coatings are applied at the SAL which have a VOC content in excess of 2.9 pounds VOC per gallon of coating less water, all emissions from the SAL shall be controlled by the existing regenerative thermal oxidizer (RTO).

- (c) Pursuant to 326 IAC 8-1-2(c), the minimum overall control efficiency of the regenerative thermal oxidizer (RTO) when being used to control the Silicone/Adhesive Line (SAL) shall be 59.6%, or no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{(V - E)}{V} \times 100$$

- Where:
- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 60 Subpart RR]

- (a) The volatile organic compound usage of the Plastisol Processing Line, identified as PPL#1, shall be limited to less than 50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The volatile organic compound usage of the Plastisol Processing Line, identified as PPL#2, shall be limited to less than 50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The volatile organic compound usage of the Silicone/Adhesive Line, identified as SAL, shall be limited to less than 50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) Pursuant to CP 039-3336-00077, the volatile organic compound usage of the Prototype Line, identified as PTL, shall be limited to less than 39 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

These usage limits combined with the potential to emit of the remaining facilities at this source is required to limit the total source-wide potential to emit of VOC to less than two hundred fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. Compliance with these usage limits will render 40 CFR 60.442(a) of Subpart RR not applicable to the coating operations (PPL#1, PPL#2, SAL and PTL).

D.1.4 Hazardous Air Pollutants (HAPs) Limitations [40 CFR 63, Subpart JJJJ][326 IAC 2-4.1]

- (a) The total usage of each individual HAP at the Plastisol Processing Line, identified as PPL#1, the Plastisol Processing Line, identified as PPL#2, the Custom Lamination Line, identified as CLL-1, the Silicone/Adhesive Line, identified as SAL, the Prototype Line, identified as PTL, the degreasing operations and the usage of cleaners and solvents shall be limited to less than a total of 9.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total usage of any combination of HAPs at the Plastisol Processing Line, identified as PPL#1, the Plastisol Processing Line, identified as PPL#2, the Custom Lamination Line, identified as CLL-1, the Silicone/Adhesive Line, identified as SAL, the Prototype Line, identified as PTL, the degreasing operations and the usage of cleaners and solvents shall be limited to less than a total of 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall ensure that the source is an area source for HAPs, including the unrestricted potential to emit HAPs from all other facilities at the source, and shall render the requirements of the NESHAP 40 CFR 63, Subpart JJJJ, not applicable to the source.

D.1.5 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.1.6 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°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility 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.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Silicone/Adhesive Line, identified as SAL and the control device (RTO).

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and VOC and HAPs usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the regenerative thermal oxidizer, to achieve compliance with condition D.1.2(b) when complying with Alternate Operating Scenario 2.

D.1.10 Testing Requirements

Within 180 days of issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency and operating parameters for the regenerative thermal oxidizer (RTO) when operating to control the SAL line, utilizing methods as approved by the Commissioner. All lines normally routed to the RTO shall be in operation and exhausting to the RTO during the testing period.

Compliance Monitoring Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Compliance Monitoring Requirements

When applying Alternate Operating Scenario 2 (Condition D.1.2(b) and (c)) to the SAL line (using non-compliant coatings and the RTO for control), the compliance monitoring requirements are as follows:

- (a) A continuous temperature monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For purposes of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average or as continuous readings. From the date of issuance of this permit until the optional approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1,400°F. A 3-hour average temperature that is below 1,400°F 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 determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test.

- (d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM.
- (e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2(a), the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1 and D.1.2(a). Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) To document compliance with Condition D.1.2(b) and (c), the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and emission limits established in Condition D.1.2(b) and (c). Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The pounds of VOC per gallon of coating solids content of each coating material as applied and solvent used.
 - (A) Records shall include inventory records, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC emission limits and the required overall control efficiency of the RTO as established in Condition D.1.11. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The continuous temperature records or the three (3) hour average temperature records for the thermal oxidizer when non-compliant coatings are being used and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

- (2) Daily records of the duct pressure or fan amperage when non-compliant coatings are being used.
- (d) To document compliance with Conditions D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and HAPs usage limits established in Conditions D.1.3 and D.1.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each monthly compliance period.
 - (1) The VOC and HAPs content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include inventory records, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and the individual and combined HAPs usage for each month; and
 - (5) The weight of VOC and the weight of individual and combined HAPs emitted for each compliance period.
- (e) The Permittee shall maintain a daily log to differentiate between times when complying with Scenario 1 or Scenario 2 in Condition D.1.2.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

D.1.14 General Provisions Relating to NSPS Subpart RR [326 IAC 12] [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60.670, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12 for the Plastisol Processing Line, identified as PPL#1, the Plastisol Processing Line, identified as PPL#2, the Custom Lamination Line, identified as CLL-1, the Silicone/Adhesive Line, identified as SAL and the Prototype Line, identified as PTL, as specified in Table 1 of 40 CFR Part 60, Subpart RR in accordance with schedule in 40 CFR 60 Subpart RR.

D.1.15 NSPS Subpart RR Requirements [40 CFR Part 60, Subpart RR] [326 IAC 12]

Pursuant to CFR Part 60, Subpart RR, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart RR, which are incorporated by reference as 326 IAC 12 for the Plastisol Processing Line, identified as PPL#1, the Plastisol Processing Line, identified as PPL#2, the Custom Lamination Line, identified as CLL-1, the Silicone/Adhesive Line, identified as SAL and the Prototype Line, identified as PTL, as specified in the following portions of Subpart RR:

Permit Reviewer: Kyle Gregory/MES / APT

§ 60.440
§ 60.441
§ 60.445

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY
100 North Senate Avenue
MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
X 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
X 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 AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY**

Part 70 Quarterly Report

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077
Facility: Plastisol Processing Line, identified as PPL#1
Parameter: Volatile Organic Compound (VOC) usage.
Limit: Less than 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY**

Part 70 Quarterly Report

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077
Facility: Plastisol Processing Line, identified as PPL#2
Parameter: Volatile Organic Compound (VOC) usage.
Limit: Less than 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY**

Part 70 Quarterly Report

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077
Facility: Silicone/Adhesive Line, identified as SAL
Parameter: Volatile Organic Compound (VOC) usage.
Limit: Less than 50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY**

Part 70 Quarterly Report

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077
Facility: Prototype Line, identified as PTL
Parameter: Volatile Organic Compound (VOC) usage.
Limit: Less than 39 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	(Parameter)	(Parameter)	(Parameter)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY**

Part 70 Quarterly Report

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077
Facilities: The Plastisol Processing Line, identified as PPL#1, the Plastisol Processing Line, identified as PPL#2, the Custom Lamination Line, identified as CLL-1, the Silicone/Adhesive Line, identified as SAL, the Prototype Line, identified as PTL, the degreasing operations and the usage of cleaners and solvents.
Parameter: Worst case of any individual hazardous air pollutants (HAPs).
Limit: Less than a total of 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY**

Part 70 Quarterly Report

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077
Facilities: The Plastisol Processing Line, identified as PPL#1, the Plastisol Processing Line, identified as PPL#2, the Custom Lamination Line, identified as CLL-1, the Silicone/Adhesive Line, identified as SAL, the Prototype Line, identified as PTL, the degreasing operations and the usage of cleaners and solvents.
Parameter: Total combined hazardous air pollutants (HAPs) usage.
Limit: Less than a total of 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Total HAPs Usage (tons)	Total HAPs Usage (tons)	Total HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Gaska Tape, Inc.
Source Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-23298-00077

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Attachment A to a Part 70 Operating Permit

Source Description and Location

Source Name:	Gaska Tape, Inc.
Source Location:	1810 West Lusher Ave., Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3086
Permit Renewal No.:	T039-23298-00077
Operation Permit Issuance Date:	2/12/2008
Significant Permit Modification No.:	039-26891-00077
Reviewer:	APT

Subpart RR—Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

Source: 48 FR 48375, Oct. 18, 1983, unless otherwise noted.

§ 60.440 Applicability and designation of affected facility.

- (a) The affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials.
- (b) Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of this subpart. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of this subpart.
- (c) This subpart applies to any affected facility which begins construction, modification, or reconstruction after December 30, 1980.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.441 Definitions and symbols.

- (a) Except as otherwise required by the context, terms used in this subpart are defined in the Act, in subpart A of this part, or in this section as follows:

Coating applicator means an apparatus used to apply a surface coating to a continuous web.

Coating line means any number or combination of adhesive, release, or precoat coating applicators, flashoff areas, and ovens which coat a continuous web, located between a web unwind station and a web rewind station, to produce pressure sensitive tape and label materials.

Coating solids applied means the solids content of the coated adhesive, release, or precoat as measured by Method 24.

Flashoff area means the portion of a coating line after the coating applicator and usually before the oven entrance.

Fugitive volatile organic compounds means any volatile organic compounds which are emitted from the coating applicator and flashoff areas and are not emitted in the oven.

Hood or enclosure means any device used to capture fugitive volatile organic compounds.

Oven means a chamber which uses heat or irradiation to bake, cure, polymerize, or dry a surface coating.

Precoat means a coating operation in which a coating other than an adhesive or release is applied to a surface during the production of a pressure sensitive tape or label product.

Solvent applied in the coating means all organic solvent contained in the adhesive, release, and precoat formulations that is metered into the coating applicator from the formulation area.

Total enclosure means a structure or building around the coating applicator and flashoff area or the entire coating line for the purpose of confining and totally capturing fugitive VOC emissions.

VOC means volatile organic compound.

(b) All symbols used in this subpart not defined below are given meaning in the Act or in subpart A of this part.

a =the gas stream vents exiting the emission control device.

b =the gas stream vents entering the emission control device.

C_{aj} =the concentration of VOC (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.

C_{bi} =the concentration of VOC (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.

C_{fk} =the concentration of VOC (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.

G =the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month.

M_{ci} =the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records.

M_r =the total mass (kg) of solvent recovered for a calendar month.

Q_{aj} =the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic meters per hour.

Q_{bi} =the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic meters per hour.

Q_{fk} =the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic meters per hour.

R =the overall VOC emission reduction achieved for a calendar month (in percent).

R_q =the required overall VOC emission reduction (in percent).

W_o =the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.442 Standard for volatile organic compounds.

(a) On and after the date on which the performance test required by §60.8 has been completed each owner or operator subject to this subpart shall:

(1) Cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or

(2) Demonstrate for each affected facility;

(i) A 90 percent overall VOC emission reduction as calculated over a calendar month; or

(ii) The percent overall VOC emission reduction specified in §60.443(b) as calculated over a calendar month.

§ 60.443 Compliance provisions.

(a) To determine compliance with §60.442 the owner or operator of the affected facility shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

(1) Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

(2) Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^n W_{oi} M_{ci}}{\sum_{i=1}^n W_{si} M_{ci}}$$

(3) For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with §60.442(a)(1).

(b) To determine compliance with §60.442(a)(2), the owner or operator shall calculate the required overall VOC emission reduction according to the following equation:

$$R_q = \frac{G - 0.20}{G} \times 100$$

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

(c) Where compliance with the emission limits specified in §60.442(a)(2) is achieved through the use of a solvent recovery system, the owner or operator shall determine the overall VOC emission reduction for a one calendar month period by the following equation:

$$R = \sum_{i=1}^n \frac{M_r}{W_{oi} M_{ci}} \times 100$$

If the R value is equal to or greater than the R_q value specified in paragraph (b) of this section, then compliance with §60.442(a)(2) is demonstrated.

(d) Where compliance with the emission limit specified in §60.442(a)(2) is achieved through the use of a solvent destruction device, the owner or operator shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in paragraph (b) of this section to the overall VOC emission reduction demonstrated in the most recent performance test which complied with §60.442(a)(2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with §60.442(a)(2).

(e) Where compliance with §60.442(a)(2) is achieved through the use of a solvent destruction device, the owner or operator shall continuously record the destruction device combustion temperature during coating operations for thermal incineration destruction devices or the gas temperature upstream and downstream of the incinerator catalyst bed during coating operations for catalytic incineration destruction devices. For thermal incineration destruction devices the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with §60.442(a)(2). For catalytic incineration destruction devices, the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device immediately before the catalyst bed is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with §60.442(a)(2), and all 3-hour periods (during actual coating operations) during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference of the device during the most recent performance test complying with §60.442(a)(2).

(f) After the initial performance test required for all affected facilities under §60.8, compliance with the VOC emission limitation and percentage reduction requirements under §60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.

(g) If a common emission control device is used to recover or destroy solvent from more than one affected facility, the performance of that control device is assumed to be equal for each of the affected facilities. Compliance with §60.442(a)(2) is determined by the methods specified in paragraphs (c) and (d) of this section and is performed simultaneously on all affected facilities.

(h) If a common emission control device is used to recover solvent from an existing facility (or facilities) as well as from an affected facility (or facilities), the overall VOC emission reduction for the affected facility (or facilities), for the purpose of compliance, shall be determined by the following procedures:

(1) The owner or operator of the existing facility (or facilities) shall determine the mass of solvent recovered for a calendar month period from the existing facility (or facilities) prior to the connection of the affected facility (or facilities) to the emission control device.

(2) The affected facility (or facilities) shall then be connected to the emission control device.

(3) The owner or operator shall determine the total mass of solvent recovered from both the existing and affected facilities over a calendar month period. The mass of solvent determined in paragraph (h)(1) of this section from the existing facility shall be subtracted from the total mass of recovered solvent to obtain the mass of solvent recovered from the affected facility (or facilities). The overall VOC emission reduction of the affected facility (or facilities) can then be determined as specified in paragraph (c) of this section.

(i) If a common emission control device(s) is used to destruct solvent from an existing facility (or facilities) as well as from an affected facility (or facilities), the overall VOC emission reduction for the affected facility (or facilities), for the purpose of compliance, shall be determined by the following procedures:

(1) The owner or operator shall operate the emission control device with both the existing and affected facilities connected.

(2) The concentration of VOC (in parts per million by volume) after the common emission control device shall be determined as specified in §60.444(c). This concentration is used in the calculation of compliance for both the existing and affected facilities.

(3) The volumetric flow out of the common control device attributable to the affected facility (or facilities) shall be calculated by first determining the ratio of the volumetric flow entering the common control device attributable to the affected facility (facilities) to the total volumetric flow entering the common control device from both existing and affected facilities. The multiplication of this ratio by

the total volumetric flow out of the common control device yields the flow attributable to the affected facility (facilities). Compliance is determined by the use of the equation specified in §60.444(c).

(j) Startups and shutdowns are normal operation for this source category. Emissions from these operations are to be included when determining if the standard specified at §60.442(a)(2) is being attained.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.444 Performance test procedures.

(a) The performance test for affected facilities complying with §60.442 without the use of add-on controls shall be identical to the procedures specified in §60.443(a).

(b) The performance test for affected facilities controlled by a solvent recovery device shall be conducted as follows:

(1) The performance test shall be a one calendar month test and not the average of three runs as specified in §60.8(f).

(2) The weighted average mass of VOC per mass of coating solids applied for a one calendar month period shall be determined as specified in §60.443(a) (1) and (2).

(3) Calculate the required percent overall VOC emission reduction as specified in §60.443(b).

(4) Inventory VOC usage and VOC recovery for a one calendar month period.

(5) Determine the percent overall VOC emission reduction as specified in §60.443(c).

(c) The performance test for affected facilities controlled by a solvent destruction device shall be conducted as follows:

(1) The performance of the solvent destruction device shall be determined by averaging the results of three test runs as specified in §60.8(f).

(2) Determine for each affected facility prior to each test run the weighted average mass of VOC per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in §60.443(a). In this application the quantities of W_{oi} , W_{si} , and M_{ci} shall be determined for the time period of each test run and not a calendar month as specified in §60.441.

(3) Calculate the required percent overall VOC emission reduction as specified in §60.443(b).

(4) Determine the percent overall VOC emission reduction of the solvent destruction device by the following equation and procedures:

$$R = \frac{\sum_{i=1}^n Q_{oi}C_{oi} - \sum_{j=1}^m Q_{oj}C_{oj}}{\sum_{i=1}^n Q_{oi}C_{oi} + \sum_{k=1}^l Q_{ok}C_{ok}} \times 100$$

(i) The owner or operator of the affected facility shall construct the overall VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §60.446(b).

(ii) The owner or operator of an affected facility shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive VOC emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is totally capturing fugitive VOC emissions, then no additional total enclosure will be required for the performance test.

(iii) For each affected facility where the value of R is greater than or equal to the value of R_q calculated in §60.443(b), compliance with §60.442(a)(2) is demonstrated.

§ 60.445 Monitoring of operations and recordkeeping.

- (a) The owner or operator of an affected facility subject to this subpart shall maintain a calendar month record of all coatings used and the results of the reference test method specified in §60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.
- (b) The owner or operator of an affected facility controlled by a solvent recovery device shall maintain a calendar month record of the amount of solvent applied in the coating at each affected facility.
- (c) The owner or operator of an affected facility controlled by a solvent recovery device shall install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of solvent recovered by the device over a calendar month period. The monitoring device shall be accurate within ± 2.0 percent. The owner or operator shall maintain a calendar month record of the amount of solvent recovered by the device.
- (d) The owner or operator of an affected facility operating at the conditions specified in §60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.
- (e) The owner or operator of an affected facility controlled by a thermal incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 2.5 °C.
- (f) The owner or operator of an affected facility controlled by a catalytic incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed.
- (g) The owner or operator of an affected facility controlled by a solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. No continuous monitor shall be required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system.
- (h) Records of the measurements required in §§60.443 and 60.445 must be retained for at least two years following the date of the measurements.

§ 60.446 Test methods and procedures.

- (a) The VOC content per unit of coating solids applied and compliance with §60.422(a)(1) shall be determined by either Method 24 and the equations specified in §60.443 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Administrator may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.
- (b) Method 25 shall be used to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere. Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flowrate, molecular weight, and moisture of all sampled gas streams. For Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.
- (c) If the owner or operator can demonstrate to the Administrator's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Administrator will approve testing of representative stacks on a case-by-case basis.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.447 Reporting requirements.

- (a) For all affected facilities subject to compliance with §60.442, the performance test data and results from the performance test shall be submitted to the Administrator as specified in §60.8(a) of the General Provisions (40 CFR part 60, subpart A).

- (b) Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator of exceedances of the VOC emission limits specified in §60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.
- (c) The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.443(e). If no such periods occur, the owner or operator shall state this in the report.
- (d) The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the
Technical Support Document for
a Significant Permit Modification to a Part 70 (Title V) Operating Permit Renewal

Source Description and Location

Source Name:	Gaska Tape, Inc.
Source Location:	1810 West Lusher Avenue, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3086
Operating Permit No.:	T039-23298-00077
Significant Permit Modification No.:	T039-26891-00077
Permit Reviewer:	APT

On February 27, 2009, the Office of Air Quality (OAQ) had a notice published in The Elkhart Truth in Elkhart, Indiana stating that Gaska Tape Inc., had applied for a Significant Permit Modification to its Part 70 Operating Permit Renewal for a stationary foamed plastic adhesive tape manufacturing plant. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal 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 renewal should be issued as proposed.

No comments on the proposed Significant Permit Modification No. T039-26891-00077, were received as of March 31, 2009.

OAQ Changes

Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch. Necessary changes will be noted in this addendum only, as no changes will be made to the TSD.

The new addresses to be found throughout the permit are as follows:

**Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**

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

IDEM Contact

- (a) Questions regarding this proposed Significant Permit Modification can be directed to Angela Taylor 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) 234-6543 or toll free at 1-800-451-6027 extension 4-6543.
- (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 Part 70 Significant Permit Modification

Source Description and Location

Source Name: Gaska Tape, Inc.
Source Location: 1810 West Lusher Avenue, Elkhart, Indiana 46517
County: Elkhart
SIC Code: 3086
Permit Renewal No.: T039-23298-00077
Operation Permit Issuance Date: 2/12/2008
Significant Permit Modification No.: 039-26891-00077
Reviewer: APT

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T039-23298-00077 on February 12, 2008, for the operation of a foamed plastic adhesive tape manufacturing plant.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, 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.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) 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. Elkhart 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.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

(b) PM_{2.5}

Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules is July 15, 2008. Indiana has three (3) 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 PM_{2.5} emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

Elkhart 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.

(d) Fugitive Emissions

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

Source Status

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

Pollutant	Emissions (ton/yr)
PM	< 250
PM ₁₀	< 250
SO ₂	0.03
VOC	< 250
CO	4.05
NO _x	4.82

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2-1(gg)(2)), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the updated calculations from Part 70 Operating Permit Renewal No. T039-23298-00077, issued on February 12, 2008.

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

HAPs	Emissions (ton/yr)
Individual HAP	< 10
Total HAPS	< 25

- (a) This existing source is a minor source of HAPs, as defined in 40 CFR 63.41. This source has been limited to an area source of HAPs pursuant to SPM 039-20898-00077, issued on October 6, 2005. Therefore, source-wide HAP emissions are limited to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

Actual Emissions

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

Pollutant	Actual Emissions (ton/yr)
PM	0.1
PM ₁₀	0.1
SO ₂	0.002
VOC	60
CO	(not reported)
NO _x	0.02
Worst Case HAP (Trichloroethylene)	9.66
Total HAPs	(not reported)

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application submitted by Gaska Tape, Inc. on August 20, 2008, requesting the use of an existing regenerative thermal oxidizer (RTO) to comply with the provisions of 326 IAC 8-2-5 (Paper Coating Operations) for the silicone/adhesive line (SAL) as allowed by the provisions of 326 IAC 8-1-2(a)(2).

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

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

There are no new or modified emission units included in this permit modification. Therefore, this permit modification is not subject to 326 IAC 2-7-10.5.

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification does not qualify as a minor permit modification. Pursuant to 326 IAC 2-7-12(b)(B), modifications that involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the Part 70 permit do not qualify as minor permit modifications.

Permit Level Determination – PSD

There are no new or modified emission units included in this permit modification. Therefore, this permit modification is not subject to 326 IAC 2-2 (PSD). This source will remain a minor source pursuant to 326 IAC 2-2 (PSD).

Federal Rule Applicability Determination

- (a) **New Source Performance Standards (NSPS)**
 There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for to this proposed modification.
- (b) **National Emission Standards for Hazardous Air Pollutants (NESHAP)**
 There are no new National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) requirements included in this permit for this proposed modification.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to emission units that involve a pollutant-specific emission unit that meet the following criteria:
 - (1) have a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) are subject to an emission limitation or standard for that pollutant; and
 - (3) use a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

CAM Applicability Analysis							
Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
SAL - VOC	Y	Y	587.79	29.39	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the silicone/adhesive line (SAL) and will be incorporated into the Part 70 permit at the time of the next renewal.

State Rule Applicability Determination

- 326 IAC 2-4.1 (New source toxics control)
 The operation of the Plastisol Processing Line, identified as PPL#1, Plastisol Processing Line, identified as PPL#2, Custom Lamination Line, identified as CLL-1, Silicone/Adhesive Line, identified as SAL and the Prototype Line, identified as PTL, will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. This source has been limited to an area source of HAPs pursuant to SPM 039-20898-00077, issued on October 6, 2005. Therefore, 326 IAC 2-4.1 does not apply.
- 326 IAC 8-2-5 (Paper Coating Operations)
 The Plastisol Processing Line, identified as PPL#1, Plastisol Processing Line, identified as PPL#2, Custom Lamination Line, identified as CLL-1, Silicone/Adhesive Line, identified as SAL and the Prototype Line, identified as PTL were each constructed after January 1, 1980, are located at a source with a potential to emit one hundred (100) tons per year of volatile organic compounds and are

considered pressure sensitive paper coating operations. Therefore, pursuant to 326 IAC 8-2-1, these facilities are subject to the requirements of 326 IAC 8-2-5.

Pursuant to 326 IAC 8-2-5, no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds VOC per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

MSDS information submitted by the source indicates that only compliant coatings are used at the Plastisol Processing Line #1, Plastisol Processing Line #2, the Custom Laminating Line, and the Prototype Line. The SAL line occasionally uses coatings that are above the allowable two and nine-tenths (2.9) pounds VOC per gallon and is required to use daily weighted averaging in order to comply with 326 IAC 8-2-5 when using non-compliant coatings.

Pursuant to this modification, 039-26891-00077, Gaska Tape, Inc. has elected to utilize a control device (the existing regenerative thermal oxidizer, RTO) to comply with this rule when using non-compliant coatings on the SAL line. The following is a description of the process and the associated calculations involved with using the RTO for compliance:

- (a) Pursuant to 326 IAC 8-1-2(a), a source may comply with a VOC emission limitation using a carbon adsorption system, thermal oxidizer or catalytic oxidizer. In these cases, the source must comply with the equivalent VOC emission limit expressed in terms of pounds of VOC per gallon of coating solids. The equivalent VOC emission limit is calculated using the following equation pursuant to 326 IAC 8-1-2(b):

$$E = L / (1 - L/D)$$

Where,

E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.

L = Applicable emission limit from Article 8 in pounds of VOC per gallon of coating, less water (2.9 lbs/gal.).

D = Baseline solvent density of VOC in the coating, which is equal to 7.36 pounds of VOC per gallon of solvent.

$$E = 2.9 / (1 - 2.9/7.36) = 4.79 \text{ lbs VOC / gallon of solids}$$

Therefore, the pounds of VOC per gallon of coating solids shall be limited to less than 4.79 pounds of VOC per gallon of coating solids as applied in the SAL line at all times that coatings are being used that have a VOC content above two and nine-tenths (2.9) pounds VOC per gallon of coating, less water.

- (b) Pursuant to 326 IAC 8-1-2(c), the minimum overall control efficiency required of the existing regenerative thermal oxidizer (RTO) when being used to control the Silicone/Adhesive Line (SAL) shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{(V - E)}{V} \times 100$$

Where,

V = The actual VOC content of the coating (or when multiple coatings are used, the daily weighted average VOC content of all coatings) as applied in pounds of VOC per gallon of coating solids applied. ($V = 4.54 / (1 - 4.54 / 7.36) = 11.85 \text{ lbs VOC / gal. coating solids}$)

E = The equivalent emission limit in pounds of VOC per gallon of coating solids as applied (4.79 lbs VOC/ gal coating solids).

O = The equivalent overall efficiency of the capture system and control device.

Based on the information provided by the source, the VOC content of the worst case coating used before controls on the Silicone/Adhesive Line (SAL) is 11.85 lbs VOC / gallon of coating solids. Therefore the minimum control efficiency required for compliance at the SAL is:

$$O = \frac{11.85 - 4.79}{11.85} \times 100 = 59.6\%$$

Section D.1 conditions will be modified to reflect the two (2) alternate operating scenarios available to Gaska Tape, Inc. to achieve compliance with 326 IAC 8-2-5 for the SAL line. Refer to the Proposed Changes Section of this document for the changes to the permit.

Testing Requirements

The SAL line and RTO are subject to testing requirements in order to demonstrate compliance with the 326 IAC 8-2-5. Pursuant to 326 IAC 8-1-2(c) and based on information submitted by the source, the minimum overall control efficiency required of the existing regenerative thermal oxidizer (RTO) when being used to control the SAL line shall be 59.6%.

During the period within 180 days after issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency (capture and destruction) and the operating temperature for the regenerative thermal oxidizer (RTO) when operating to control the SAL line, utilizing methods as approved by the Commissioner. All lines normally routed to the RTO shall be in operation and exhausting to the RTO during the testing period.

Compliance Determination and Monitoring Requirements

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

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

There are new compliance determination requirements applicable to this source as a result of this modification. The compliance monitoring requirements applicable to this source are as follows:

When applying Alternate Operating Scenario 2 to the SAL line (using non-compliant coatings and the RTO for control), the compliance monitoring requirements for the RTO are as follows:

Regenerative Thermal Oxidizer

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the regenerative thermal oxidizer (RTO) to achieve compliance with the requirements of 326 IAC 8-2-5 (Paper Coating Operations) when non-compliant coatings are in use at the the Silicone/Adhesive Line identified as SAL.
- (b) A continuous temperature monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For purposes of this condition,

continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the optional approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1,400°F. A 3-hour average temperature that is below 1,400°F 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.

- (c) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM.
- (d) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test.
- (e) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM.
- (f) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 039-26110-00518. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Modification No. 1: For clarification purposes the emission units have been specifically listed in the following condition:

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

Pursuant to 326 IAC 8-2-5, no owner or operator of a coating line subject to this requirement (**one (1) Prototype Line, identified as PTL; one (1) Custom Lamination Line, identified as CLL-1; one (1) Plastisol Processing Line, identified as PPL#2; and one (1) Plastisol Processing Line, identified as PPL#1**) may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

Modification No. 2: The following condition has been added to the permit:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5][326 IAC 8-1-2]

- (a) **Alternate Operating Scenario 1**
Pursuant to 326 IAC 8-2-5, the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from one (1) Silicone/Adhesive Line, identified as SAL.
- (b) **Alternate Operating Scenario 2**
Pursuant to 326 IAC 8-1-2(b), VOC emissions from the one (1) Silicone/Adhesive Line, identified

as SAL shall be limited to less than 4.79 pounds of VOC per gallon of coating solids when coatings are applied in the SAL which have a VOC content in excess of 2.9 pounds VOC per gallon of coating less water. This equivalent limit was determined by using the following equation:

$$E = \frac{L}{\left(1 - \frac{L}{D}\right)}$$

Where,

E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.

L = Applicable emission limit from Article 8 in pounds of VOC per gallon of coating, less water (2.9 lbs/gal.).

D = Baseline solvent density of VOC in the coating, which is equal to 7.36 pounds of VOC per gallon of solvent.

$$E = 2.9 / (1 - 2.9 / 7.36) = 4.78565 \text{ lbs VOC / gallon of solids}$$

Therefore, the equivalent VOC emission limit for the SAL is 4.79 lbs VOC / gallon of solids.

When coatings are applied at the SAL which have a VOC content in excess of 2.9 pounds VOC per gallon of coating less water, all emissions from the SAL shall be controlled by the existing regenerative thermal oxidizer (RTO).

- (c) Pursuant to 326 IAC 8-1-2(c), the minimum overall control efficiency of the regenerative thermal oxidizer (RTO) when being used to control the Silicone/Adhesive Line (SAL) shall be 59.6%, or no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{(V - E)}{V} \times 100$$

- Where:
- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.**
 - E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.**
 - O = Equivalent overall efficiency of the capture system and control device as a percentage.**

Modification No. 3: Compliance with VOC limits established in D.1.2 will be met through the use of compliant coatings (two and nine-tenths (2.9) pounds VOC per gallon less water) or by use of the RTO controlling VOC emissions from the SAL line pursuant to 326 IAC 8-1-2(b). When using a control device to establish compliance with a limit, the SAL line and the RTO are required to have a preventive maintenance plan established according to Section B of this permit. Therefore, the following condition has been added to the permit:

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Silicone/Adhesive Line, identified as SAL and the control device (RTO).

Modification No. 4: Compliance with VOC limits established in D.1.2 will be met through the use of compliant coatings (two and nine-tenths (2.9) pounds VOC per gallon less water) or by use of the RTO controlling VOC emissions from the SAL line pursuant to 326 IAC 8-1-2(b). Therefore, the following condition has been removed from the permit:

~~D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2(a)(7)]~~

~~Compliance with the VOC content limit in Condition D.1.1 for the silicone/adhesive line, identified as SAL, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis on days when non-compliant coatings are being used. This volume weighted average shall be determined by the following equation:~~

$$A = \frac{\sum(C \times U)}{\sum U}$$

~~Where: A is the volume weighted average in pounds VOC per gallon
C is the VOC content of the coating in pounds VOC per gallon and
U is the usage rate of the coating in gallons per unit, hour, day or other unit of time.~~

Modification No. 5: The following condition has been modified as follows:

Compliance Determination Requirements

D.1.68 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and VOC and HAPs usage limitations contained in Conditions D.1.1, D.1.2, **D.1.3** and **D.1.34** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Modification No. 6: The following conditions have been added to the Compliance Determination Requirements of this permit:

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the regenerative thermal oxidizer, to achieve compliance with condition D.1.2(b) when complying with Alternate Operating Scenario 2.

D.1.10 Testing Requirements

Within 180 days of issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency and operating parameters for the regenerative thermal oxidizer (RTO) when operating to control the SAL line, utilizing methods as approved by the Commissioner. All lines normally routed to the RTO shall be in operation and exhausting to the RTO during the testing period.

Modification No. 7: There are new compliance monitoring requirements applicable to this source as a result of this modification. Therefore, the following Compliance Monitoring Requirements have been added to the permit:

Compliance Monitoring Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Compliance Monitoring Requirements

When applying Alternate Operating Scenario 2 (Condition D.1.2(b) and (c)) to the SAL line (using non-compliant coatings and the RTO for control), the compliance monitoring requirements are as follows:

- (a) A continuous temperature monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For purposes of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average or as continuous readings. From the date of issuance of this permit until the optional approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1,400°F. A 3-hour average temperature that is below 1,400°F 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 determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test.
- (d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM.
- (e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Modification No. 8: Compliance with VOC limits established in D.1.2 will be met through the use of compliant coatings (two and nine-tenths (2.9) pounds VOC per gallon less water) or by use of the RTO controlling VOC emissions from the SAL line pursuant to 326 IAC 8-1-2(b). Therefore, the following condition has been modified, as daily record keeping is no longer required for the coating lines, and the recordkeeping has been reorganized:

D.1.812 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2(a), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (2) shall be ~~taken daily and shall be~~ complete and sufficient to establish compliance with the VOC content limit established in Conditions D.1.1 and D.1.2(a). Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.

- ~~(2) The amount of coating material and solvent used on daily basis.~~
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- ~~(3) The volume weighted average VOC content of the coatings used for each day that non-compliant coatings are used.~~
- (b) To document compliance with Condition D.1.2**(b) and (c)**, and ~~D.1.3~~, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ below. Records maintained for (1) through ~~(5)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and HAPs usage **content and emission** limits established in Conditions D.1.2**(b) and (c)**, and ~~D.1.3~~. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The **pounds of VOC per gallon of coating solids** and HAPs content of each coating material **as applied** and solvent used. ~~less water.~~
 - ~~(2) The amount of coating material and solvent used on monthly basis.~~
 - (A) Records shall include **inventory records**, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - ~~(3) The cleanup solvent usage for each month;~~
 - ~~(4) The total VOC and the individual and combined HAPs usage for each month; and~~
 - ~~(5) The weight of VOC and the weight of individual and combined HAPs emitted for each compliance period.~~
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC emission limits and the required overall control efficiency of the RTO as established in Condition D.1.11. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The continuous temperature records or the three (3) hour average temperature records for the thermal oxidizer when non-compliant coatings are being used and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (2) Daily records of the duct pressure or fan amperage when non-compliant coatings are being used.
- (d) To document compliance with Conditions D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and HAPs usage limits established in Conditions D.1.3 and D.1.4.

Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) **The VOC and HAPs content of each coating material and solvent used less water.**
 - (2) **The amount of coating material and solvent used on a monthly basis.**
 - (A) **Records shall include inventory records, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
 - (3) **The cleanup solvent usage for each month;**
 - (4) **The total VOC and the individual and combined HAPs usage for each month; and**
 - (5) **The weight of VOC and the weight of individual and combined HAPs emitted for each compliance period.**
- (e) **The Permittee shall maintain a daily log to differentiate between times when complying with Scenario 1 or Scenario 2 in Condition D.1.2.**
- (ef) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Modification No. 9: The following Reporting Requirements have been modified to reflect the reports necessary to ensure compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4:

D.1.913 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.23 and D.1.34 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Modification No. 10: IDEM, Office of Air Quality has modified the way NSPS requirements are incorporated into Part 70 permits by referencing the sections of the NSPS that are applicable to the source in the permit, and including the entire NSPS as an attachment to the permit. Therefore, the following changes have been made to the permit:

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

D.1.104 General Provisions Relating to NSPS Subpart RR [326 IAC 12] [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60.670, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12 for the Plastisol Processing Line, identified as PPL#1, the Plastisol Processing Line, identified as PPL#2, the Custom Lamination Line, identified as CLL-1, the Silicone/Adhesive Line, identified as SAL and the Prototype Line, identified as PTL, as specified in Table 1 of 40 CFR Part 60, Subpart RR in accordance with schedule in 40 CFR 60 Subpart RR.

D.1.145 NSPS Subpart RR Requirements [40 CFR Part 60, Subpart RR] [326 IAC 12]

Pursuant to CFR Part 60, Subpart RR, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart RR, which are incorporated by reference as 326 IAC 12 for the Plastisol Processing Line, identified as PPL#1, the Plastisol Processing Line, identified as PPL#2, the Custom Lamination Line, identified as CLL-1, the Silicone/Adhesive Line, identified as SAL and the Prototype Line, identified as

PTL, as specified as follows, in the following portions of Subpart RR:

§ 60.440
§ 60.441
§ 60.445

§ 60.440—Applicability and designation of affected facility.

(a) The affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials.

(b) Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of this subpart. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of this subpart.

(c) This subpart applies to any affected facility which begins construction, modification, or reconstruction after December 30, 1980.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.441—Definitions and symbols.

(a) Except as otherwise required by the context, terms used in this subpart are defined in the Act, in subpart A of this part, or in this section as follows:

Coating applicator means an apparatus used to apply a surface coating to a continuous web.

Coating line means any number or combination of adhesive, release, or precoat coating applicators, flashoff areas, and ovens which coat a continuous web, located between a web unwind station and a web rewind station, to produce pressure sensitive tape and label materials.

Coating solids applied means the solids content of the coated adhesive, release, or precoat as measured by Method 24.

Flashoff area means the portion of a coating line after the coating applicator and usually before the oven entrance.

Fugitive volatile organic compounds means any volatile organic compounds which are emitted from the coating applicator and flashoff areas and are not emitted in the oven.

Hood or enclosure means any device used to capture fugitive volatile organic compounds.

Oven means a chamber which uses heat or irradiation to bake, cure, polymerize, or dry a surface coating.

Precoat means a coating operation in which a coating other than an adhesive or release is applied to a surface during the production of a pressure sensitive tape or label product.

Solvent applied in the coating means all organic solvent contained in the adhesive, release, and precoat formulations that is metered into the coating applicator from the formulation area.

Total enclosure means a structure or building around the coating applicator and flashoff area or the entire coating line for the purpose of confining and totally capturing fugitive VOC emissions.

VOC means volatile organic compound.

(b) All symbols used in this subpart not defined below are given meaning in the Act or in subpart A of this part.

a=the gas stream vents exiting the emission control device.

~~b = the gas stream vents entering the emission control device.~~

~~C_{aj} = the concentration of VOC (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.~~

~~C_{bi} = the concentration of VOC (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.~~

~~C_{ki} = the concentration of VOC (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.~~

~~G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month.~~

~~M_{ei} = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records.~~

~~M_r = the total mass (kg) of solvent recovered for a calendar month.~~

~~Q_{aj} = the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic meters per hour.~~

~~Q_{bi} = the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic meters per hour.~~

~~Q_{ki} = the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic meters per hour.~~

~~R = the overall VOC emission reduction achieved for a calendar month (in percent).~~

~~R_e = the required overall VOC emission reduction (in percent).~~

~~W_{ei} = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.~~

~~W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.~~

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

~~**§ 60.445 — Monitoring of operations and recordkeeping.**~~

~~(d) The owner or operator of an affected facility operating at the conditions specified in §60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.~~

~~(h) Records of the measurements required in §§60.443 and 60.445 must be retained for at least two years following the date of the measurements.~~

The complete NSPS, as attachment A to the permit, has been noted in the Table of Contents, as have all changes made pursuant to this permit modification.

Conclusion and Recommendation

This proposed permit modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 039-26891-00077. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

Appendix A: Emissions Calculations

Emissions Summary

Company Name: Gaska Tape, Inc.

Address City IN Zip: 1810 West Lusher Avenue, Elkhart, Indiana 46517

County: Dubois

Permit Number: T039-23298-00077

SIC Code: 2434

Significant Permit Modification No.: 039-26891-00077

Reviewer: APT

Date: 1/9/2009

Unlimited/Uncontrolled Emissions

Process Description	Unlimited/Uncontrolled Potential to Emit (tons/year)									
	Criteria Pollutants							Hazardous Air Pollutants		
	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	Total HAPs	Worst Case HAP	
PPL#1	0	0	0	-----	-----	407.13	-----	293.29	293.29	Trichloroethylene
PPL#2	0	0	0	-----	-----	338.17	-----	0.00	-----	-----
CLL-1	0	0	0	-----	-----	3.57	-----	0.00	-----	-----
SAL	0	0	0	-----	-----	587.79	-----	111.48	111.48	Toluene
PTL	0	0	0	-----	-----	27.40	-----	0.00	-----	-----
Degreasing	-----	-----	-----	-----	-----	8.11	-----	0.00	-----	-----
Insignificant Activities	15	15	15	-----	-----	-----	-----	0.03	0.03	-----
Combustion	0.09	0.37	0.37	0.03	4.82	0.26	4.05	0.09	0.09	Hexane
TOTAL	15.09	15.37	15.37	0.03	4.82	1372.43	4.05	404.89	293.29	Trichloroethylene

Limited/Controlled Emissions

Process Description	Limited/Controlled Potential Emissions (tons/year)									
	Criteria Pollutants							Hazardous Air Pollutants		
	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	Total HAPs	Worst Case HAP	
PPL#1	0	0	0	-----	-----	< 50	-----	< 25	< 10	Trichloroethylene
PPL#2	0	0	0	-----	-----	< 50	-----			-----
CLL-1	0	0	0	-----	-----	-----	-----			-----
SAL	0	0	0	-----	-----	< 50	-----			Toluene
PTL	0	0	0	-----	-----	< 39	-----			-----
Degreasing	-----	-----	-----	-----	-----	-----	-----			-----
Insignificant Activities	15	15	15	-----	-----	-----	-----	-----	-----	-----
Combustion	0.09	0.37	0.37	0.03	4.82	0.26	4.05	-----	-----	Hexane
TOTAL										
PSD Major Threshold	250	250	250	250	250	250	250	25.00	10.00	

**Appendix A: Emissions Calculations
VOC, HAPs and Particulate**

Company Name: Gaska Tape, Inc.
Address City IN Zip: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Operating Permit No.: T039-23298-00077
Permit Issuance: Feb. 12, 2008
Significant Permit Modification No.: 039-26891-00077
Reviewer: APT
Date: 1/9/2009

Facility	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Weight % Toluene	Weight % Trichloroethylene	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (ton/yr)	HAPs Emissions* (ton/yr)	Particulate Potential (ton/yr)	Transfer Efficiency
PPL#1	Gelva 2670	8.66	38.3%	38.0%	0.3%	39.7%	59.1%	0.0%	0.00%	2.99	8.55	0.04	0.03	0.66	15.9	2.91	0.00	0.00	100%
PPL#1	Jaflex DINP	10.0	1.65%	0.170%	1.5%	0.010%	98.5%	0.0%	0.00%	49.8	3.38	0.15	0.15	24.92	598	109	0.00	0.00	100%
PPL#1	Solvent	12.2	100%	0.000%	100.0%	0.000%	0.0%	0.0%	99.40%	0.004	1320	12.18	12.18	67.37	1617	295	293	0.00	100%
														Subtotal:		2231	407	293	0.00
PPL#2	Gelva 2670	8.66	38.3%	38.0%	0.3%	39.7%	59.1%	0.0%	0.00%	4.10	12.6	0.04	0.03	1.34	32.2	5.88	0.00	0.00	100%
PPL#2	Jaflex DINP	10.0	1.65%	0.170%	1.5%	0.010%	98.5%	0.0%	0.00%	48.8	10.5	0.15	0.15	75.87	1821	332	0.00	0.00	100%
														Subtotal:		1853	338	0.00	0.00
CLL-1	Gelva 2670	8.66	38.3%	38.0%	0.3%	39.7%	59.1%	0.0%	0.00%	2.99	10.5	0.04	0.03	0.82	19.6	3.57	0.00	0.00	100%
SAL	Gelva 2839	7.83	58.0%	0.0%	58.0%	0.0%	42.0%	11.0%	0.00%	3.94	7.50	4.54	4.54	134	3221	588	111.48	0.00	100%
PTL	Jaflex DINP	10.0	1.65%	0.170%	1.5%	0.010%	98.5%	0.0%	0.00%	35.2	1.20	0.15	0.15	6.26	150	27.4	0.00	0.00	100%
Degreasing	Solvent	6.6	100.00%	0.000%	100.0%	0.000%	0.0%	0.0%	0.00%	0.280	1.00	6.61	6.61	1.85	44	8.11	0.00	0.00	100%
														Uncontrolled:	313.28	7518.71	1372.16	404.77	0.00

Facility	VOC Control Device	Control Efficiency (%)	PTE of VOC after Control (tons/yr)
PPL#1	RTO/ not required	95.0%	0.15
PPL#1	RTO/ not required	95.0%	5.46
PPL#1	RTO/ not required	95.0%	14.75
PPL#2	RTO/ not required	95.0%	0.29
PPL#2	RTO/ not required	95.0%	16.61
CLL-1	no control	N/A	3.57
SAL	RTO	95.0%	29.39
PTL	no control	N/A	27.40
Degreasing	no control		8.11

Controlled = 105.73

* The only HAPs emitted in these calculations are Toluene and Trichloroethylene

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

HAPs emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

Company Name: Gaska Tape, Inc.
Address City IN Zip: 1810 West Lusher Avenue, Elkhart, Indiana 46517
Operating Permit No.: T039-23298-00077
Permit Issuance: Feb. 12, 2008
Significant Permit Modification No.: 039-26891-00077
Reviewer: APT
Date: January 9, 2009

Thermal Oxidizer Capacity: 1 MMBtu/hr
 Natural Gas Comb. Units 10 MMBtu/hr
 Total Capacity: 11 MMBtu/hr

Aggregate	Potential Throughput
Heat Input Capacity	MMCF/yr
MMBtu/hr	
11.0	96.4

Criteria Pollutant Emissions

	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.09	0.37	0.37	0.03	4.82	0.26	4.05

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

METHODOLOGY

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hap Emissions

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Worst Case HAP
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.012E-04	5.782E-05	3.614E-03	8.672E-02	1.638E-04	0.09

	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPS
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.409E-05	5.300E-05	6.745E-05	1.831E-05	1.012E-04	0.09

METHODOLOGY

Methodology is the same as page 1.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.