



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: February 10, 2009

RE: American Renolit Corporation / 091 - 27025 - 00127

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**American Renolit Corporation
1207 East Lincolnway
LaPorte, Indiana 46350**

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M091-27025-00127	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 10, 2009 Expiration Date: February 10, 2019

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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary flexible plastic film manufacturing operation.

Source Address:	1207 East Lincolnway, LaPorte, Indiana 46350
Mailing Address:	1207 East Lincolnway, LaPorte, Indiana 46350
General Source Phone Number:	219-324-6886
SIC Code:	3081
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
- (1) One (1) PVC plastic film calender, identified as Calender 1, with a maximum throughput rate of 1,600 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 1999, emissions from the extruder, mill and calender are exhausting to stack CAL 1-1.
 - (2) One (1) PVC plastic film calender, identified as Calender 2, with a maximum throughput rate of 925 pounds of raw material per hour, consisting of a PVC mixing area, extruder, mill, calender, edge trimmer and winder, constructed in 2001, emissions from the extruder, mill and calender are exhausting to stack CAL 2-1.
 - (3) One (1) PVC plastic film calender, identified as Calender 3, with a maximum throughput rate of 1,800 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 2003, emissions from the extruder, mill and calender are exhausting to stack CAL 3-1.
 - (4) One (1) PVC plastic film calender, identified as Calender 4, with a maximum throughput rate of 2,000 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 2006, emissions from the extruder, mill and calender are exhausting to stack CAL 4-1.
 - (5) Two (2) weigh scale and mixing areas, identified as W1 and W6, with each weigh scale area handling a maximum of 13,200 pounds of material per hour, consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks, identified as Tanks 91 and 92, emissions are controlled by two (2) dust

collectors, which are exhausting to stacks PVC MIX-2 and PVC MIX-4.

- (6) Two (2) dry scales, identified as W11 and W12, with a combined maximum capacity of 4,400 pounds per hour, emissions from the scales and bag stations are controlled by one (1) dust collector, which is exhausting to stack PVC MIX-5.
- (7) PVC storage and handling system, identified as PVC Handling Silos 1-8, including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and eight (8) storage silos, identified as Silos 1 through 8.
- (8) PVC storage and handling system, identified as PVC Handling Silos 17-25, including a pneumatic conveying system capable of handling 4,400 pounds of PVC per hour and nine (9) storage silos, controlled by one (1) dust collector, consisting of the following:
 - (A) Three (3) PVC resin silos, identified as Silos 17, 18 and 19, each with a capacity of 5,540 cubic feet, controlled by one (1) dust collector.
 - (B) Two (2) Interior big bag silos, identified as Silos 20 and 23, each with a capacity of 88 cubic feet, controlled by one (1) dust collector.
 - (C) Four (4) Interior bag silos, identified as Silos 21, 22, 24, and 25, each with a capacity of 17 cubic feet, controlled by one (1) dust collector.
- (9) Two (2) natural gas fired oil heaters, identified as OH-1 and OH-2, each with a maximum heat input of 3.4 MMBtu per hour.
- (10) Eight (8) liquid scale areas, identified as W2, W3, W4, W5, W7, W8, W9 and W10.
- (11) Thirty-one (31) storage tanks, comprising:
 - (A) Ten (10) storage tanks, identified as T-31 through T-34, T-38 and T-40 through T-44, each having a maximum storage capacity of 65 gallons.
 - (B) Four (4) storage tanks, identified as T-45 through T48, each having a maximum storage capacity of 8,086 gallons.
 - (C) Two (2) holding tanks, identified as HT-1 and HT-2, each having a maximum storage capacity of 52.8 gallons.
 - (D) Three (3) storage tanks, identified as T-35, T-36 and T-37, each having a maximum capacity of 85 gallons.
 - (E) Four (4) liquid tanks, identified as T50, T51, T52 and T53, each having a maximum storage capacity of 5,100 gallons.
 - (F) Six (6) liquid tanks, identified as T55, T56, T57, T58, T59, and T60, each having a maximum storage capacity of 610 gallons.
 - (G) Two (2) heated tanks, identified as HT3 and HT4, each having a maximum storage capacity of 54 gallons.
- (12) Six (6) cooling towers.

- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
- (1) One (1) PP plastic film manufacturing line, identified as PP Line 1, with a maximum throughput rate of 1,000 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 1A and 1B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1985, emissions from the chill roll are exhausting to stack PP1-1.
 - (2) One (1) scrap recycling system, identified as PP Line 1 Scrap Grinding, with a maximum throughput capacity of 131 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container, controlled by a dust collector, constructed in 1985, and exhausting to stack PP1-2.
 - (3) One (1) PP plastic film manufacturing line, identified as PP Line 2, with a maximum throughput rate of 1200 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 2A and 2B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1988, emissions from the chill roll are exhausting to stacks PP2-1 and PP2-2.
 - (4) One (1) scrap recycling system, identified as PP Line 2 Scrap Grinding, with a maximum throughput capacity of 171 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones and scrap storage container, controlled by a dust collector, constructed in 1988, and exhausting to stack PP2-3.
 - (5) One (1) PP plastic film manufacturing line, identified as PP Line 3, with a maximum throughput rate of 1400 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 3A and 3B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1997, emissions from the chill roll are exhausting to stack PP3-1.
 - (6) One (1) scrap recycling system, identified as PP Line 3 Scrap Grinding, with a maximum throughput capacity of 179 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container, controlled by a dust collector, constructed in 1997, and exhausting to stack PP3-2.
 - (7) Polypropylene storage and handling systems, identified as PP Handling, with a maximum throughput capacity of 3600 pounds per hour, including eight (8) silos, identified as Silos 9 through 16, five (5) storage hoppers, three (3) gravity feed weigh scales, and a mixing hopper, controlled by one (1) dust collector. The storage silos are used to store polypropylene plastic resin pellets.
 - (8) Two (2) cooling towers.
- (c) One (1) lacquer line, identified as LL1, used to coat PVC plastic films with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches, constructed in 2003.

Under NSPS 40 CFR 60 Subpart FFF, the one (1) rotogravure roll press is considered an affected source as part of an existing lacquer line facility.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M091-27025-00127, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

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

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

B.7 Duty to Provide Information

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

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification 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.

B.10 Preventive Maintenance Plan [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, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M091-27025-00127 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) 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.19 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) 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.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
- (1) One (1) PVC plastic film calender, identified as Calender 1, with a maximum throughput rate of 1,600 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 1999, emissions from the extruder, mill and calender are exhausting to stack CAL 1-1.
 - (2) One (1) PVC plastic film calender, identified as Calender 2, with a maximum throughput rate of 925 pounds of raw material per hour, consisting of a PVC mixing area, extruder, mill, calender, edge trimmer and winder, constructed in 2001, emissions from the extruder, mill and calender are exhausting to stack CAL 2-1.
 - (3) One (1) PVC plastic film calender, identified as Calender 3, with a maximum throughput rate of 1,800 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 2003, emissions from the extruder, mill and calender are exhausting to stack CAL 3-1.
 - (4) One (1) PVC plastic film calender, identified as Calender 4, with a maximum throughput rate of 2,000 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 2006, emissions from the extruder, mill and calender are exhausting to stack CAL 4-1.
 - (5) Two (2) weigh scale and mixing areas, identified as W1 and W6, with each weigh scale area handling a maximum of 13,200 pounds of material per hour, consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks, identified as Tanks 91 and 92, emissions are controlled by two (2) dust collectors, which are exhausting to stacks PVC MIX-2 and PVC MIX-4.
 - (6) Two (2) dry scales, identified as W11 and W12, with a combined maximum capacity of 4,400 pounds per hour, emissions from the scales and bag stations are controlled by one (1) dust collector, which is exhausting to stack PVC MIX-5.
 - (7) PVC storage and handling system, identified as PVC Handling Silos 1-8, including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and eight (8) storage silos, identified as Silos 1 through 8, controlled by one (1) dust collector.
 - (8) PVC storage and handling system, identified as PVC Handling Silos 17-25, including a pneumatic conveying system capable of handling 4,400 pounds of PVC per hour and nine (9) storage silos, consisting of the following:
 - (A) Three (3) PVC resin silos, identified as Silos 17, 18 and 19, each with a capacity of 5,540 cubic feet, controlled by one (1) dust collector.
 - (B) Two (2) Interior big bag silos, identified as Silos 20 and 23, each with a capacity of 88 cubic feet, controlled by one (1) dust collector.
 - (C) Four (4) Interior bag silos, identified as Silos 21, 22, 24 and 25, each with a capacity of 17 cubic feet, controlled by one (1) dust collector.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PVC film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
Calender 1	1,600	0.80	3.53
Calender 2	925	0.46	2.45
Calender 3	1,800	0.90	3.82
Calender 4	2,000	1.00	4.10
Each of the Two (2) Weigh Scale and Mixing Areas (W1 and W6)	13,200	6.60	14.5
Dry scale (W11 and W12)	4,400	2.20	6.95
PVC Handling (Silos 1 – 8)	13,200	6.60	14.5
PVC Handling (Silos 17 – 25)	4,400	2.20	6.95

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with D.1.1, the dust collectors for particulate control shall be in operation and control emissions from the PVC manufacturing facilities at all times that the PVC manufacturing facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse/dust collector used in conjunction with the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling, at least once per day when the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse/dust collectors is outside the normal range of 1.5 and 7.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.6 Broken or Failed Bag/Dust Collector Detection

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

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

Record Keeping and Reporting Requirement

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records daily of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop notation (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
- (1) One (1) PP plastic film manufacturing line, identified as PP Line 1, with a maximum throughput rate of 1,000 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 1A and 1B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1985, emissions from the chill roll are exhausting to stack PP1-1.
 - (2) One (1) scrap recycling system, identified as PP Line 1 Scrap Grinding, with a maximum throughput capacity of 131 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container, controlled by a dust collector, constructed in 1985, and exhausting to stack PP1-2.
 - (3) One (1) PP plastic film manufacturing line, identified as PP Line 2, with a maximum throughput rate of 1200 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 2A and 2B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1988, emissions from the chill roll are exhausting to stacks PP2-1 and PP2-2.
 - (4) One (1) scrap recycling system, identified as PP Line 2 Scrap Grinding, with a maximum throughput capacity of 171 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones and scrap storage container, controlled by a dust collector, constructed in 1988, and exhausting to stack PP2-3.
 - (5) One (1) PP plastic film manufacturing line, identified as PP Line 3, with a maximum throughput rate of 1400 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 3A and 3B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1997, emissions from the chill roll are exhausting to stack PP3-1.
 - (6) One (1) scrap recycling system, identified as PP Line 3 Scrap Grinding, with a maximum throughput capacity of 179 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container, controlled by a dust collector, constructed in 1997, and exhausting to stack PP3-2.
 - (7) Polypropylene storage and handling systems, identified as PP Handling, with a maximum throughput capacity of 3600 pounds per hour, including eight (8) silos, identified as Silos 9 through 16, five (5) storage hoppers, three (3) gravity feed weigh scales, and a mixing hopper, controlled by one (1) dust collector. The storage silos are used to store polypropylene plastic resin pellets.

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

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PP film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
PP Line 1	1000	0.50	2.58
PP Line 1 Scrap Grinding	131	0.07	0.66
PP Line 2	1200	0.60	2.91
PP Line 2 Scrap Grinding	171	0.09	0.79
PP Line 3	1400	0.70	3.23
PP Line 3 Scrap Grinding	179	0.09	0.81
PP Handling	3600	1.80	6.08

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with D.2.1, the dust collectors for particulate control shall be in operation and control emissions from the PP manufacturing facilities at all times that the PP manufacturing facilities are in operation.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) lacquer line, identified as LL1, used to coat PVC plastic films with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches, constructed in 2003.

Under NSPS 40 CFR 60 Subpart FFF, the one (1) rotogravure roll press is considered an affected source as part of an existing lacquer line facility.

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

Emission Limitations and Standards

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating), the volatile organic compound (VOC) content of the coating from one (1) lacquer line with one (1) rotogravure roll press shall be limited to 4.8 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator.

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 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 Δ as supplied Δ and Δ as applied Δ 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.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) lacquer line (identified as LL1), constructed in 2003, with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches.

Under NSPS 40 CFR 60 Subpart FFF, the one (1) rotogravure roll press is considered an affected source as part of an existing lacquer line facility.

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

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

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to this facility described in this section except when otherwise specified in 40 CFR 60, Subpart FFF.

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the vinyl printing operation except as otherwise specified in 40 CFR Part 60, Subpart FFF.
- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 New Source Performance Standards for Flexible Vinyl and Urethane Coating and Printing [40 CFR 60, Subpart FFF] [326 IAC 12]

Pursuant to 40 CFR Part 60, Subpart FFF, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart FFF (included as Attachment A), which are incorporated by reference as 326 IAC 12 for the one (1) lacquer line with the rotogravure roll press used to coat flexible PVC films.

- 40 CFR 60.580(a) and (b)
40 CFR 60.581
40 CFR 60.582(a)(1)
40 CFR 60.583
40 CFR 60.584(a)
40 CFR 60.585

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: American Renolit Corporation
Source Address: 1207 East Lincolnway, LaPorte, Indiana 46350
Mailing Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP No.: M091-27025-00127

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	American Renolit Corporation
Address:	1207 East Lincolnway
City:	LaPorte, Indiana 46350
Phone #:	219-324-6886
MSOP #:	M091-27025-00127

I hereby certify that American Renolit Corporation is :

still in operation.

no longer in operation.

I hereby certify that American Renolit Corporation is :

in compliance with the requirements of MSOP M091-27025-00127.

not in compliance with the requirements of MSOP M091-27025-00127.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100 TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	American Renolit Corporation
Source Location:	1207 East Lincolnway, LaPorte, IN 46350
County:	LaPorte
SIC Code:	3081
Permit Renewal No.:	091-27025-00127
Permit Reviewer:	Janet Mobley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from American Renolit Corporation relating to the operation of a flexible plastic film manufacturing plant.

History

On September 26, 2008, American Renolit Corporation submitted an application to the OAQ requesting to renew its operating permit. American Renolit Corporation was issued a MSOP on November 3, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
- (1) One (1) PVC plastic film calender, identified as Calender 1, with a maximum throughput rate of 1,600 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 1999, emissions from the extruder, mill and calender are exhausting to stack CAL 1-1.
 - (2) One (1) PVC plastic film calender, identified as Calender 2, with a maximum throughput rate of 925 pounds of raw material per hour, consisting of a PVC mixing area, extruder, mill, calender, edge trimmer and winder, constructed in 2001, emissions from the extruder, mill and calender are exhausting to stack CAL 2-1.
 - (3) One (1) PVC plastic film calender, identified as Calender 3, with a maximum throughput rate of 1,800 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 2003, emissions from the extruder, mill and calender are exhausting to stack CAL 3-1.
 - (4) One (1) PVC plastic film calender, identified as Calender 4, with a maximum throughput rate of 2,000 pounds of raw material per hour, consisting of a PVC mix area, extruder, mill, calender, edge trimmer and winder, constructed in 2006, emissions from the extruder, mill and calender are exhausting to stack CAL 4-1.
 - (5) Two (2) weigh scale and mixing areas, identified as W1 and W6, with each weigh scale area handling a maximum of 13,200 pounds of material per hour, consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks, identified as Tanks 91 and 92, emissions are controlled by two (2) dust collectors, which are exhausting to stacks PVC MIX-2 and PVC MIX-4.

- (6) Two (2) dry scales, identified as W11 and W12, with a combined maximum capacity of 4,400 pounds per hour, emissions from the scales and bag stations are controlled by one (1) dust collector, which is exhausting to stack PVC MIX-5.
- (7) PVC storage and handling system, identified as PVC Handling Silos 1-8, including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and eight (8) storage silos, identified as Silos 1 through 8, controlled by one (1) dust collector.
- (8) PVC storage and handling system, identified as PVC Handling Silos 17-25, including a pneumatic conveying system capable of handling 4,400 pounds of PVC per hour and nine (9) storage silos, controlled by one (1) dust collector, consisting of the following:
 - (A) Three (3) PVC resin silos, identified as Silos 17, 18 and 19, each with a capacity of 5,540 cubic feet.
 - (B) Two (2) Interior big bag silos, identified as Silos 20 and 23, each with a capacity of 88 cubic feet.
 - (C) Four (4) Interior bag silos, identified as Silos 21, 22, 24, and 25, each with a capacity of 17 cubic feet.
- (9) Two (2) natural gas fired oil heaters, identified as OH-1 and OH-2, each with a maximum heat input of 3.4 MMBtu per hour.
- (10) Eight (8) liquid scale areas, identified as W2, W3, W4, W5, W7, W8, W9 and W10.
- (11) Thirty-one (31) storage tanks, comprising:
 - (A) Ten (10) storage tanks, identified as T-31 through T-34, T-38 and T-40 through T-44, each having a maximum storage capacity of 65 gallons.
 - (B) Four (4) storage tanks, identified as T-45 through T48, each having a maximum storage capacity of 8,086 gallons.
 - (C) Two (2) holding tanks, identified as HT-1 and HT-2, each having a maximum storage capacity of 52.8 gallons.
 - (D) Three (3) storage tanks, identified as T-35, T-36 and T-37, each having a maximum capacity of 85 gallons.
 - (E) Four (4) liquid tanks, identified as T50, T51, T52 and T53, each having a maximum storage capacity of 5,100 gallons.
 - (F) Six (6) liquid tanks, identified as T55, T56, T57, T58, T59, and T60, each having a maximum storage capacity of 610 gallons.
 - (G) Two (2) heated tanks, identified as HT3 and HT4, each having a maximum storage capacity of 54 gallons.
- (12) Six (6) cooling towers.

- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
- (1) One (1) PP plastic film manufacturing line, identified as PP Line 1, with a maximum throughput rate of 1,000 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 1A and 1B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1985, emissions from the chill roll are exhausting to stack PP1-1.
 - (2) One (1) scrap recycling system, identified as PP Line 1 Scrap Grinding, with a maximum throughput capacity of 131 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container, controlled by a dust collector, constructed in 1985, and exhausting to stack PP1-2.
 - (3) One (1) PP plastic film manufacturing line, identified as PP Line 2, with a maximum throughput rate of 1200 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 2A and 2B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1988, emissions from the chill roll are exhausting to stacks PP2-1 and PP2-2.
 - (4) One (1) scrap recycling system, identified as PP Line 2 Scrap Grinding, with a maximum throughput capacity of 171 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones and scrap storage container, controlled by a dust collector, constructed in 1988, and exhausting to stack PP2-3.
 - (5) One (1) PP plastic film manufacturing line, identified as PP Line 3, with a maximum throughput rate of 1400 pounds of raw material per hour, consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 3A and 3B), one (1) die, one (1) chill roll, one (1) corona treatment area and one (1) winder, constructed in 1997, emissions from the chill roll are exhausting to stack PP3-1.
 - (6) One (1) scrap recycling system, identified as PP Line 3 Scrap Grinding, with a maximum throughput capacity of 179 pounds of PP per hour, consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container, controlled by a dust collector, constructed in 1997, and exhausting to stack PP3-2.
 - (7) Polypropylene storage and handling systems, identified as PP Handling, with a maximum throughput capacity of 3600 pounds per hour, including eight (8) silos, identified as Silos 9 through 16, five (5) storage hoppers, three (3) gravity feed weigh scales, and a mixing hopper. The storage silos are used to store polypropylene plastic resin pellets.
 - (8) Two (2) cooling towers.
- (c) One (1) lacquer line, identified as LL1, used to coat PVC plastic films with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches, constructed in 2003.

Under NSPS 40 CFR 60 Subpart FFF, the one (1) rotogravure roll press is considered an affected source as part of an existing lacquer line facility.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are not any emission units that were constructed and/or operating without a permit at the source during this review.

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed from the source since the previous permit was issued.

Existing Approvals

Since the issuance of the MSOP (091-17752-00127) on November 3, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Notice Only Change No. 091-22656-00127 issued on March 30, 2006; and
- (b) Notice Only Change No. 091-22474-00127 issued on February 24, 2006.

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

Enforcement Issue

- (a) IDEM is aware that this MSOP renewal application was not submitted before August 5, 2008, which represents the date 90 days prior to the expiration date of the original MSOP. 326 IAC 2-6.1-7 requires that in order to be considered timely, a MSOP renewal application must be submitted at least 90 days prior to the expiration date of the current operating permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operating permit rules.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in LaPorte 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.

¹Unclassifiable or attainment effective November 15, 1990, for the 1-hour standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (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) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
 - (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.
 - (4) 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. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM2.5
LaPorte County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) Other Criteria Pollutants
LaPorte County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is still less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit (tons/year)							HAPs
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	
Calender 1	1.83	1.83	1.83	0.00	4.77	0.00	0.00	
Calender 2	1.17	1.17	1.17	0.00	2.76	0.00	0.00	
Calender 3	2.07	2.07	2.07	0.00	5.36	0.00	0.00	
Calender 4	2.77	2.77	2.77	0.00	5.96	0.00	0.00	
Weigh Scales and Mixing Areas (units W1 and W6)	1.84	1.84	1.84	0.00	0.00	0.00	0.00	
Dry Scales (units W11 and W12)	1.87	1.87	1.87	0.00	0.00	0.00	0.00	
PVC Handling Silos 1-8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PVC Handling Silos 17-25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Oil Heaters (units OH-1 and OH-2)	0.23	0.23	0.23	0.02	0.16	2.50	2.98	Negligible
PP Line 1	1.83	1.83	1.83	0.00	0.26	0.00	0.00	
PP Line 1 Scrap Grinding	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PP Line 2	2.29	2.29	2.29	0.00	0.31	0.00	0.00	
PP Line 2 Scrap Grinding	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PP Line 3	2.74	2.74	2.74	0.00	0.36	0.00	0.00	
PP Line 3 Scrap Grinding	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PP Handling Silos 9-16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
One (1) Lacquer Line (unit LL1)	0.00	0.00	0.00	0.00	67.25	0.00	0.00	6.75 total HAPs
Total Emissions	18.22	18.22	18.22	0.02	91.03	2.50	2.98	22.3
TV Major	-	100	100	100	100	100	100	10/25
PSD Major	250	250	250	250	250	250	250	-

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) is not included in the permit because the potential to emit of the source is limited to less than the Title V major source

thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

For NSPS/NESHAPs

- (a) This source is subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing (326 IAC 12) because this source uses a rotogravure roll press used to coat flexible PVC films. Pursuant to 40 CFR 60.582(a)(1), the Permittee shall use inks in Lacquer Line 1 with a weighted average VOC content less than one (1) kilogram VOC per kilogram ink solids at the affected facility.

The rotogravure roll press (Lacquer Line 1) is subject to the following portions of Subpart FFF.

- (1) 40 CFR 60.580 (a) and (b)
- (2) 40 CFR 60.581
- (3) 40 CFR 60.582(a)(1)
- (4) 40 CFR 60.583
- (5) 40 CFR 60.584(a)
- (6) 40 CFR 60.585

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described above except when otherwise specified in 40 CFR 63, Subpart FFF.

- (b) Although constructed after July 23, 1984, the storage tanks are not subject to the New Source Performance Standard (NSPS), 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12), because the maximum capacities of the storage tanks are all less than 40 cubic meters (10,567 gallons).
- (c) This source is not subject to the requirements of 40 CFR 63, Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins (326 IAC 14), because this source is not a major source of hazardous air pollutants and does not manufacture Group I polymers and resins.

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

- (d) This source is not subject to the requirements of 40 CFR 63, Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-Nylon Polyamides Production (326 IAC 14), because this source is not a major source of hazardous air pollutants and does not produce epoxy resins or non-nylon polyamides.
- (e) Although this source handles plastic materials, it is not subject to the requirements of 40 CFR 63, Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (326 IAC 14), because this source is not a major source of hazardous air pollutants and only performs finishing processes, which are specifically exempt from the requirements of this rule under 40 CFR 63.1310(d).
- (f) This source is not subject to the requirements of 40 CFR 61, Subpart F - National Emission Standard for Vinyl Chloride (326 IAC 14) because this source does not produce vinyl chloride or polymerized vinyl chloride.
- (g) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission

Standards for the Printing and Publishing Industry (326 IAC 14), because even though this source operates a rotogravure roll press, it is not a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.

- (h) This source is not subject to the requirements of 40 CFR 63, Subpart J - National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production because this source does not produce polyvinyl chloride and copolymers and is not a major source of hazardous air pollutants.
- (i) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (326 IAC 14), because this source is not a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.
- (i) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart DDDDDD - Polyvinyl Chloride and Copolymers Production for Area Sources (326 IAC 14), because this source is not one of the plants specified in 40 CFR 61.61(c) that produce polyvinyl chloride (PVC) or copolymers and it is not an area source of HAP emissions.

State Rule Applicability - Entire Source

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

This source was constructed in the late 1980s and is not in one (1) of twenty-eight (28) source categories. The source has been modified several times. At construction, the source had a potential to emit for all criteria pollutants that were less than the PSD major source threshold of 250 tons per year, and modifications undertaken since the initial construction have not increased the potential to emit to greater than 250 tons per year. Therefore, this source is a minor source under PSD and is not subject to the requirements of 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is located in LaPorte County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

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

The operation of the flexible plastic film manufacturing plant will emit less than 10 tons per year of a single HAP and less than 25 tons per year of any combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability - Polyvinyl Chloride (PVC) Film Manufacturing Facilities

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

Although the polyvinyl chloride (PVC) film manufacturing facilities were all constructed after January 1, 1980, applicability date for this rule, the potential emissions of VOC from these units are less than 25 tons per year. Therefore, the provisions of 326 IAC 8-1-6 are not applicable to these emission units.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PVC film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
Calender 1	1,600	0.80	3.53
Calender 2	925	0.46	2.45
Calender 3	1,800	0.90	3.82
Calender 4	2,000	1.00	4.10
Each of the two (2) Weigh Scale and Mixing Areas (W1 and W6)	13,200	6.60	14.5
Dry Scale (W11 and W12)	4,400	2.20	6.95
PVC Handling (Silos 1-8)	13,200	6.60	14.5
PVC Handling (Silos 17-25)	4,400	2.20	6.95

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

The dust collectors for particulate control shall be in operation at all times the polyvinyl chloride (PVC) manufacturing facilities are in operation, in order to comply with these limits.

There are no controls associated with calendar lines 1, 2, 3 and 4. Based on the calculations provided in Appendix A, these emission units will be in compliance with this rule.

State Rule Applicability - Polypropylene (PP) Film Manufacturing Facilities

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

Although the polypropylene (PP) film manufacturing facilities units were all constructed after January 1, 1980, applicability date for this rule, the potential emissions of VOC from these units are less than 25 tons per year. Therefore, the provisions of 326 IAC 8-1-6 are not applicable to these emission units.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the polypropylene (PP) film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
PP Line 1	1000	0.50	2.58
PP Line 1 Scrap Grinding	131	0.07	0.66
PP Line 2	1200	0.60	2.91
PP Line 2 Scrap Grinding	171	0.09	0.79
PP Line 3	1400	0.70	3.23
PP Line 3 Scrap Grinding	179	0.09	0.81
PP Handling System	3600	1.80	6.08

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

The dust collectors for particulate control shall be in operation at all times the polypropylene (PP) manufacturing facilities are in operation, in order to comply with these limits.

State Rule Applicability - Organic Liquid Storage Tanks

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The thirty-one (31) storage tanks are not subject to 326 IAC 8-9 because this rule applies only to sources located in Clark, Floyd, Lake, and Porter counties.

State Rule Applicability - One (1) Lacquer Line

326 IAC 8-5-5 (Graphic Arts Operation)

This source is not subject to the provisions of 326 IAC 8-5-5 (Graphic Arts Operation) because it does not operate a packaging rotogravure, publication rotogravure, or flexographic printing presses. It operates one (1) rotogravure roll press for coating the PVC plastic films.

326 IAC 8-2-11 (Fabric and Vinyl Coating)

This source is subject to 326 IAC 8-2-11 (Fabric and Vinyl Coating) because the one (1) rotogravure roll press applies either a water based primer coat or water based lacquer coat on PVC plastic films. Pursuant to this rule, the Permittee must limit the VOC content of the coating to 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator from the rotogravure roll press.

State Rule Applicability - Natural Gas Fired Oil Heaters

There are no specifically applicable regulations that apply to these emission units.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-6 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 2-6.1. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Testing Requirements

Notice Only Change No. 091-22656-00127, that was issued on March 30, 2006, required the source to demonstrate compliance with 326 IAC 2-6.1, within the period between 3 and 12 months after of the issuance of the Notice Only Change to perform a one-time VOC test for one of the PVC plastic film calenders (calender 1 through calender 4) utilizing methods as approved by the Commissioner. If the test demonstrated compliance, such test shall be sufficient, provided no significant modification occurs that could impact VOC emissions, no further testing will be required.

The test was performed on November 3, 2006, and the source was in compliance and approved by OAQ Compliance Data Section. Therefore, no testing will be required during this permit term.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse/dust collector W1, W6, W11, W12 and PVC handling	Water Pressure Drop	Daily	1.5 to 7.5 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

Daily visible emission notations of the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

The Permittee shall record the pressure drop across the baghouse/dust collector used in conjunction with the weigh scale and mixing areas (identified as W1, W6, W11 and W12) and PVC handling, at least once per day when the weigh scale and mixing areas (identified as W1, W6, W11 and W12) and PVC handling are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse/dust collectors is outside the normal range of 1.5 and 7.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

These monitoring conditions are necessary because the baghouse/dust collectors used in conjunction with the weigh scale and mixing areas and PVC handling must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-6.1 (MSOP).

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on September 26, 2008, and additional information was received on November 7 and 12, 2008, and December 4, 2008.

Conclusion

The operation of this flexible plastic film manufacturing plant shall be subject to the conditions of the attached MSOP Renewal No. 091-27025-00127.

**Appendix A: Emission Calculations
Summary**

Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M091-27025-00127
Reviewer: Janet Mobley
Date: October 1, 2008

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

Emission Units	PM	PM10	PM2.5	SO2	VOC	CO	NOx	* Highest Single HAP	Total HAPs
Calender 1	1.83	1.83	1.83	0.00	4.77	0.00	0.00	0.00	0.00
Calender 2	1.17	1.17	1.17	0.00	2.76	0.00	0.00	0.00	0.00
Calender 3	2.07	2.07	2.07	0.00	5.36	0.00	0.00	0.00	0.00
Calender 4	2.77	2.77	2.77	0.00	7.18	0.00	0.00	2.60	4.9
Weigh Scale and Mixing Areas (units W1 and W6)	1.84	1.84	1.84	0.00	0.00	0.00	0.00	0.00	0.00
Dry Scales (units W11 and W12)	1.87	1.87	1.87	0.00	0.00	0.00	0.00	0.00	0.00
PVC Handling (Silos 1-8)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PVC Handling (Silos 17-25)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Oil Heaters (Units OH-1 and OH-2)	0.06	0.23	0.23	0.02	0.16	2.50	2.98	Negligible	0.0
PP Line 1	1.83	1.83	1.83	0.00	0.26	0.00	0.00	0.00	0.00
PP Line 1 Scrap Grinding	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PP Line 2	2.29	2.29	2.29	0.00	0.31	0.00	0.00	0.00	0.00
PP Line 2 Scrap Grinding	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PP Line 3	2.74	2.74	2.74	0.00	0.36	0.00	0.00	0.00	0.0
PP Line 3 Scrap Grinding	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
PP Handling (Silos 9-16)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
One (1) Lacquer Line (unit LL1)	0.00	0.00	0.00	0.00	67.25	0.00	0.00	0.00	6.75 total HAPs
TOTAL	18.47	18.64	18.64	0.02	88.41	2.50	2.98	<10/25	<10/25

* Triethylamine

**Appendix A: Emission Calculations
PM/PM10 Emissions**

**Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP Renewal 091-27025-00127
Reviewer: Janet Mobley
Date: November 19, 2008**

Emission Units	Maximum Throughput (lbs/hour)	PM/PM10 Emission Factor (lbs/lb material)	Control Efficiency (%)	PTE of PM/PM10 Before Controls (tons/year)	PTE of PM/PM10 After Controls (tons/year)
Calender 1	1,600	2.70E-04	75.0%	1.89	0.47
Calender 2	925	2.70E-04	75.0%	1.09	0.27
Calender 3	1,800	2.70E-04	75.0%	2.13	0.53
Calender 4	2,000	2.70E-04	75.0%	2.37	0.59
Weigh Scale (W1)	13,200	9.70E-05	99.0%	5.61	0.06
Weigh Scale (W6)	13,200	9.70E-05	99.0%	5.61	0.06
Dry Scales (W11 & W12)	4,400	9.70E-05	99.0%	1.87	0.02
PVC Handling (Silos 1-8)	13,200	9.70E-05	99.0%	5.61	0.06
PVC Handling (Silos 17-25)	4,400	9.70E-05	99.0%	1.87	0.02
PP Handling (Silos 9-16)	3,600				
TOTAL				28.04	2.07

Emission factor is from calculations for MSOP 091-17752-00127, issued on November 3, 2003.

METHODOLOGY

PTE of PM/PM10 Before Controls (tons/year) = Maximum Throughput (lbs/hour) x Emission Factor (lbs/lb material) x 8760 (hours/year) x 1 ton/2,000 lbs

PTE of PM/PM10 After Controls (tons/year) = Amount of Material Collected (tons/year) *1/Actual Collection Efficiency %

**Appendix A: Emission Calculations
PM/PM10 Emissions**

**Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M091-27025-00127
Reviewer: Janet Mobley
Date: October 1, 2008**

Emission Units	Amount of Material Collected (lbs/hour)	Amount of Material Collected (tons/year)	Actual Collection Efficiency (%)	Uncontrolled PTE of PM/PM10 (tons/year)
CALENDER 1	0.31	1.37	75.0%	1.83
CALENDER 2	0.20	0.88	75.0%	1.17
CALENDER 3	0.35	1.55	75.0%	2.07
CALENDER 4	0.51	2.22	75.0%	2.77
WEIGH SCALE AND MIXING AREA (unit W1)	0.21	0.91	99.0%	0.92
WEIGH SCALE AND MIXING AREA (unit W6)	0.21	0.91	99.0%	0.92
DRY SCALES (units W11 and W12)	0.13	0.61	99.0%	1.87
PP Line 1	0.42	1.83	99.8%	1.83
PP Line 1 Scrap Grinding	0.00	0.00	0.0%	0.00
PP Line 2	0.52	2.28	99.8%	2.29
PP Line 2 Scrap Grinding	0.00	0.00	0.0%	0.00
PP Line 3	0.63	2.74	99.8%	2.74
PP Line 3 Scrap Grinding	0.00	0.00	0.0%	0.00
TOTAL				18.40

METHODOLOGY

Amount of Material Collected (tons/year) = Amount of Material Collected (lbs/hour) * 1 ton/2000 lbs * 8760 hours/year

Uncontrolled PTE of PM/PM10 (tons/year) = Amount of Material Collected (tons/year) *1/Actual Collection Efficiency %

**Appendix A: Emission Calculations
VOC Emissions**

**Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M091-27025-00127
Reviewer: Janet Mobley
Date: October 1, 2008**

Emission Units	Maximum Process Rate (lbs/hour)	Emission Factor (lb of VOC/lb of Product)	PTE of VOC (tons/year)
CALENDER 1	1600	0.00068	4.77
CALENDER 2	925	0.00068	2.76
CALENDER 3	1800	0.00068	5.36
CALENDER 4	2000	0.00068	7.18
PP LINE 1	1000	0.0000594	0.26
PP LINE 2	1200	0.0000594	0.31
PP LINE 3	1400	0.0000594	0.36
	TOTAL		21.0

Note: The emission factor of 0.00068 lbs of VOC/lb of product is from the stack test performed on Calender 1.

The emission factor of 0.0000594 lbs of VOC/lb of product is from the "Journal of the Air & Waste Management Association," Volume 49, January 1999, page 55. The emission factor is 59.4 micrograms of VOC per gram of product, which is equivalent to 0.0000594 pounds of VOC per pound of product.

METHODOLOGY

PTE of VOC (tons/year) = Maximum Process Rate (lbs/hour) * Emission Factor (lb of VOC/lb of Product) * 1 ton/2000 lbs * 8760 hour/year

**Appendix A: Emission Calculations
Natural Gas Fired Oil Heaters (UNITS OH-1 and OH-2)**

**Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M91-27025-00127
Reviewer: Janet Mobley
Date: October 1, 2008**

Heat Input Capacity
MMBtu/hour

Potential Throughput
MMCF/year

6.8

59.6

(Note: Includes two 3.4 MMBtu per hour hot oil heaters)

Pollutant

	PM*	PM10*	SO ₂	NOx	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	0.6	100 **see below	5.5	84.0
Potential To Emit (tons/year)	0.06	0.23	0.02	2.98	0.16	2.50

*PM and PM10 emission factors are filterable and condensable PM and PM10.

**Emission Factors for NOx: Uncontrolled = 100

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Fired Oil Heaters**

**Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M091-27025-00127
Reviewer: Janet Mobley
Date: October 1, 2008**

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	6.25E-05	3.57E-05	2.23E-03	5.36E-02	1.01E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	1.49E-05	3.28E-05	4.17E-05	1.13E-05	6.25E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
HAP Emissions**

**Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M091-27025-00127
Reviewer: Janet Mobley
Date: October 1, 2008**

HAP	* Emission Factor (lbs/lb processed)	Max. Material Processed (lbs/hour)				Total PVC Processed (tons/year)	PTE of HAPs (lbs/year)	PTE of HAPs (tons/year)
		Calender 1	Calender 2	Calender 3	Calender 4			
Acetophenone	9.10E-07	1600	925	1800	2000	27704	50.4	0.025
Bis (2-ethylhexyl)phthalate (DEHP)	2.30E-05	1600	925	1800	2000	27704	1274	0.64
Phenol	2.97E-04	1600	925	1800	2000	27704	16456	8.23
Vinyl Chloride Monomer (VCM)	2.40E-04	1600	925	1800	2000	27704	13298	6.65
TOTAL								15.5

* Emission factors are from "Effect of Pasticizer Type and Level on Simulated Process Emissions From Experimental Flexible Polyvinyl Chloride Compounds" published by The Vinyl Institute and Chemical Fabrics and Film Association, Inc. (1997).

METHODOLOGY

PTE of HAPs (tons/year) = Total Amount of PVC Processed (lbs/year) * Emission Factor (lbs HAP/lb processed) * 1 ton/2000 lbs

HAP	* Emission Factor (lb HAP /lb processed)	Max. Material Processed (lbs/hour)				Total Polypropylene Processed (tons/yr)	PTE of HAPs (lbs/year)	PTE of HAPs (tons/year)
		PP Line 1	PP Line 2	PP Line 3				
Acetaldehyde	8.00E-08	1000	1200	1400		15768	2.52	0.00126
Acrolein	1.00E-08	1000	1200	1400		15768	0.32	0.00016
Acrylic Acid	8.00E-08	1000	1200	1400		15768	2.52	0.00126
Formaldehyde	9.00E-08	1000	1200	1400		15768	2.84	0.00142
Methylethylketone	4.00E-08	1000	1200	1400		15768	1.26	0.00063
Propionaldehyde	2.00E-08	1000	1200	1400		15768	0.63	0.00032
TOTAL								0.005

* Emission Factors are from Table 5 in "Development of Emission Factors for Polypropylene Processing" published in the *Journal of Air & Waste Management Association*, Volume 49, January 1999.

Methodology:

PTE of HAPs (tons/year) = Total Amount of Polypropylene Processed (lbs/year) * Emission Factor (lbs HAP/lb processed) * 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC Emissions**

Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M091-27025-00127
Reviewer: Janet Mobley
Date: October 1, 2008

Press I.D.	Maximum Line Speed (ft/min)	Maximum Print Width (inches)	Max. Throughput (MMin ² /year)
LL1	131	63.0	52,145

Press I.D	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
LL1				
Lacquer 70218	11.4	14.8%	100%	44.0
Lacquer 70212	11.4	16.6%	100%	49.3
Primer	8.5	8.10%	100%	18.0

*** Total PTE = 67.25 ton/year**

* Only one lacquer material is used at a given time in addition to the primer. Therefore, only the worst case emissions from the use of lacquer are added to the total PTE.

METHODOLOGY

Max. Throughput (MMin²/year) = Maxium line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year

PTE of VOC (tons/year) = Maximum Coverage lbs/MMin² * Weight % volatiles * Flash off % * Max. throughput (MMin²/year) * 1 ton/ 2000 lbs

Actual Hours of Operation = PTE of VOC (lbs/hour) * Acutal hours of operation/year * Actual days of operation/year

**Appendix A: Emission Calculations
HAP Emissions**

Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M091-27025-00127
Reviewer: Janet Mobley
Date: October 1, 2008

Material	Max. Usage Rate (lb/hour)	Weight % Triethylamine	PTE of Triethylamine (tons/year)
Lacquer 70218	44.2	2.5%	4.84
Lacquer 70212	61.6	2.5%	6.75
* TOTAL PTE			6.75

* Only one lacquer material is used at a given time in addition to the primer. Therefore, only the worst case emissions from the use of lacquer is added to the total PTE. The primer does not contain any HAPs.

Note: Triethylamine is found in WF-4664.90.92 % of WF-4664 is contained in Lacquer 70212 and 65.21% of WF-4664 is contained in Lacquer 70218

METHODOLOGY

Potential To Emit of HAPs (ton/year) = Max. Usage Rate (lb/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC Emissions**

Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
MSOP: M091-27025-00127
Reviewer: Janet Mobley
Date: December 5, 2008

TOLUENE							
MATERIAL NAME	MATERIAL ID NUMBER	WEIGHT % HAP	MAX PTE LB/HR	MAX PTE TPY @ 8760	MAX PTE TPY @ ACTUAL	EMINV ACTUAL EMIS TPY @ACTUAL	LB HAP PER LB SOLID
Ashland	Drewplus W-4502	15.00%	0.04	0.16	0.04	0.04	0.15
Jowat	195.4	15.00%	0.10	0.41	0.10	0.10	0.15
Jowat	409.4	15.00%	4.07	17.85	4.14	4.07	0.15
STAHL	LA-1661	15.00%	0.00	0.01	0.00	0.00	0.15
STAHL	Permutex 4664	15.00%	4.77	20.90	4.85	4.77	0.15
STAHL	Permutex 5580	15.00%	0.27	1.18	0.27	0.27	0.15
STAHL	Permutex WD-2830	15.00%	0.26	1.15	0.27	0.26	0.15
STAHL	RM-21-746	15.00%	0.00	0.01	0.00	0.00	0.15
STAHL	WF-13-433	15.00%	0.56	2.46	0.57	0.56	0.15

XYLENE, METHYL ETHYL KETONE, METHYL ISOBUTYL KETONE, ETHYL BENZENE							
MATERIAL NAME	MATERIAL ID NUMBER	WEIGHT % HAP	MAX PTE LB/HR	MAX PTE TPY @ 8760	MAX PTE TPY @ ACTUAL	EMINV ACTUAL EMIS TPY @ACTUAL	LB HAP PER LB SOLID
Ashland	Drewplus W-4502	15.00%	0.00	0.00	0.00	0.00	0.00
Jowat	195.4	15.00%	0.00	0.00	0.00	0.00	0.00
Jowat	409.4	15.00%	0.00	0.00	0.00	0.00	0.00
STAHL	LA-1661	15.00%	0.00	0.00	0.00	0.00	0.00
STAHL	Permutex 4664	15.00%	0.00	0.00	0.00	0.00	0.00
STAHL	Permutex 5580	15.00%	0.00	0.00	0.00	0.00	0.00
STAHL	Permutex WD-2830	15.00%	0.00	0.00	0.00	0.00	0.00
STAHL	RM-21-746	15.00%	0.00	0.00	0.00	0.00	0.00
STAHL	WF-13-433	15.00%	0.00	0.00	0.00	0.00	0.00

TOTALS			10.08	44.14	10.24	10.08	1.35
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**TOTAL HAPS
PTE TPY**

44.14

Attachment A

**American Renolit Corporation
1207 East Lincolnway
LaPorte, Indiana 46350**

Permit No. M091-27025-00127

New Source Performance Standards for Subpart FFF—Standards of Performance for Flexible Vinyl and Urethane Coating and Printing

Source: 49 FR 26892, June 29, 1984, unless otherwise noted.

§ 60.580 Applicability and designation of affected facility.

(a) The affected facility to which the provisions of this subpart apply is each rotogravure printing line used to print or coat flexible vinyl or urethane products.

(b) This subpart applies to any affected facility which begins construction, modification, or reconstruction after January 18, 1983.

(c) For facilities controlled by a solvent recovery emission control device, the provisions of §60.584(a) requiring monitoring of operations will not apply until EPA has promulgated performance specifications under appendix B for the continuous monitoring system. After the promulgation of performance specifications, these provisions will apply to each affected facility under paragraph (b) of this section. Facilities controlled by a solvent recovery emission control device that become subject to the standard prior to promulgation of performance specifications must conduct performance tests in accordance with §60.13(b) after performance specifications are promulgated.

§ 60.581 Definitions and symbols.

(a) All terms used in this subpart, not defined below, are given the same meaning as in the Act or in subpart A of this part.

Emission control device means any solvent recovery or solvent destruction device used to control volatile organic compounds (VOC) emissions from flexible vinyl and urethane rotogravure printing lines.

Emission control system means the combination of an emission control device and a vapor capture system for the purpose of reducing VOC emissions from flexible vinyl and urethane rotogravure printing lines.

Flexible vinyl and urethane products mean those products, except for resilient floor coverings (1977 Standard Industry Code 3996) and flexible packaging, that are more than 50 micrometers (0.002 inches) thick, and that consist of or contain a vinyl or urethane sheet or a vinyl or urethane coated web.

Gravure cylinder means a plated cylinder with a printing image consisting of minute cells or indentations, specifically engraved or etched into the cylinder's surface to hold ink when continuously revolved through a fountain of ink.

Ink means any mixture of ink, coating solids, organic solvents including dilution solvent, and water that is applied to the web of flexible vinyl or urethane on a rotogravure printing line.

Ink solids means the solids content of an ink as determined by Method 24, ink manufacturer's formulation data, or plant blending records.

Inventory system means a method of physically accounting for the quantity of ink, solvent, and solids used at one or more affected facilities during a time period. The system is based on plant purchase or inventory records.

Plant blending records means those records which document the weight fraction of organic solvents and solids used in the formulation or preparation of inks at the vinyl or urethane printing plant where they are used.

Rotogravure print station means any device designed to print or coat inks on one side of a continuous web or substrate using the intaglio printing process with a gravure cylinder.

Rotogravure printing line means any number of rotogravure print stations and associated dryers capable of printing or coating simultaneously on the same continuous vinyl or urethane web or substrate, which is fed from a continuous roll.

Vapor capture system means any device or combination of devices designed to contain, collect, and route organic solvent vapors emitted from the flexible vinyl or urethane rotogravure printing line.

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

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

bthe gas stream vents entering the emission control device.

ftthe gas stream vents which are not directed to an emission control device.

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

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

C_{fk} =the concentration of VOC in each gas stream (k) for the time period which is not directed to an emission control device, in parts per million by volume.

Gthe weighted average mass of VOC per mass of ink solids applied, in kilograms per kilogram.

M_{ci} =the total mass of each ink (i) applied in the time period as determined from plant records, in kilograms.

M_{dj} =the total mass of each dilution solvent (j) added at the print line in the time period determined from plant records, in kilograms.

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

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

Q_{fk} =the volumetric flow rate of each effluent gas stream (k) not directed to an emission control device, in standard cubic meters per hour.

Ethe VOC emission reduction efficiency (as a fraction) of the emission control device during performance testing.

Fthe VOC emission capture efficiency (as a fraction) of the vapor capture system during performance testing.

W_{oi} =the weight fraction of VOC in each ink (i) used in the time period as determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

W_{si} means the weight fraction of solids in each ink (i) used in the time period as determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

W_{oj} means the weight fraction of VOC in each dilution solvent (j) added at the print line in the time period determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

[49 FR 26892, June 29, 1984; 49 FR 32848, Aug. 17, 1984, as amended at 65 FR 61768, Oct. 17, 2000]

§ 60.582 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 either:

(1) Use inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids at each affected facility, or

(2) Reduce VOC emissions to the atmosphere by 85 percent from each affected facility.

(b) [Reserved]

§ 60.583 Test methods and procedures.

(a) Methods in appendix A of this part, except as provided under §60.8(b), shall be used to determine compliance with §60.582(a) as follows:

(1) Method 24 for analysis of inks. If nonphotochemically reactive solvents are used in the inks, standard gas chromatographic techniques may be used to identify and quantify these solvents. The results of Method 24 may be adjusted to subtract these solvents from the measured VOC content.

(2) Method 25A for VOC concentration (the calibration gas shall be propane);

(3) Method 1 for sample and velocity traverses;

(4) Method 2 for velocity and volumetric flow rates;

(5) Method 3 for gas analysis;

(6) Method 4 for stack gas moisture.

(b) To demonstrate compliance with §60.582(a)(1), the owner or operator of an affected facility shall determine the weighted average VOC content of the inks according to the following procedures:

(1) Determine and record the VOC content and amount of each ink used at the print head, including the VOC content and amount of diluent solvent, for any time periods when VOC emission control equipment is not used.

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

$$G = \frac{\sum_{i=1}^n (W_{oi}M_{ci}) + \sum_{j=1}^m (W_{oj}M_{dj})}{\sum_{i=1}^n (M_{ci}W_{si})}$$

(3) The weighted average VOC content of the inks shall be calculated over a period that does not exceed one calendar month, or four consecutive weeks. A facility that uses an accounting system based on quarters consisting of two 28 calendar day periods and one 35 calendar day period may use an averaging period of 35 calendar days four times per year, provided the use of such an accounting system is documented in the initial performance test.

(4) Each determination of the weighted average VOC content shall constitute a performance test for any period when VOC emission control equipment is not used. Results of the initial performance test must be reported to the Administrator. Method 24 or ink manufacturers' formulation data along with plant blending records (if plant blending is done) may be used to determine VOC content. The Administrator may require the use of Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant blending records.

(5) If, during the time periods when emission control equipment is not used, all inks used contain less than 1.0 kilogram VOC per kilogram ink solids, the owner or operator is not required to calculate the weighted average VOC content, but must verify and record the VOC content of each ink (including any added dilution solvent) used as determined by Method 24, ink manufacturers' formulation data, or plant blending records.

(c) To demonstrate compliance with §60.582(a)(1), the owner or operator may determine the weighted average VOC content using an inventory system.

(1) The inventory system shall accurately account to the nearest kilogram for the VOC content of all inks and dilution solvent used, recycled, and discarded for each affected facility during the averaging period. Separate records must be kept for each affected facility.

(2) To determine VOC content of inks and dilution solvent used or recycled, Method 24 or ink manufacturers' formulation data must be used in combination with plant blending records (if plant blending is done) or inventory records or purchase records for new inks or dilution solvent.

(3) For inks to be discarded, only Method 24 shall be used to determine the VOC content. Inks to be discarded may be combined prior to measurement of volume or weight and testing by Method 24.

(4) The Administrator may require the use of Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant records.

(5) The Administrator shall approve the inventory system of accounting for VOC content prior to the initial performance test.

(d) To demonstrate compliance with §60.582(a)(2), the owner or operator of an affected facility controlled by a solvent recovery emission control device or an incineration control device shall conduct a performance test to determine overall VOC emission control efficiency according to the following procedures:

(1) The performance test shall consist of three runs. Each test run must last a minimum of 30 minutes and shall continue until the printing operation is interrupted or until 180 minutes of continuous operation occurs. During each test run, the print line shall be printing continuously and operating normally. The VOC emission reduction efficiency achieved for each test run is averaged over the entire test run period.

(2) VOC concentration values at each site shall be measured simultaneously.

(3) The volumetric flow rate shall be determined from one Method 2 measurement for each test run conducted immediately prior to, during, or after that test run. Volumetric flow rates at each site do not need to be measured simultaneously.

(4) In order to determine capture efficiency from an affected facility, all fugitive VOC emissions from the affected facility shall be captured and vented through stacks suitable for measurement. During a performance test, the owner or operator of an affected facility located in an area with other sources of VOC shall isolate the affected facility from other sources of VOC. These two requirements shall be accomplished using one of the following methods:

(i) Build a permanent enclosure around the affected facility;

(ii) Build a temporary enclosure around the affected facility and duplicate, to an extent that is reasonably feasible, the ventilation conditions that are in effect when the affected facility is not enclosed (one way to do this is to divide the room exhaust rate by the volume of the room and then duplicate that quotient or 20 air changes per hour, whichever is smaller, in the temporary enclosure); or

(iii) Shut down all other sources of VOC and continue to exhaust fugitive emissions from the affected facility through any building ventilation system and other room exhausts such as print line ovens and embossers.

(5) For each affected facility, compliance with §60.582(a)(2) has been demonstrated if the average value of the overall control efficiency (EF) for the three runs is equal to or greater than 85 percent. An overall control efficiency is calculated for each run as follows:

(i) For efficiency of the emission control device,

$$E = \frac{\sum_{i=1}^n (Q_{bi} C_{bi}) - \sum_{j=1}^m (Q_{aj} C_{aj})}{\sum_{i=1}^n (Q_{bi} C_{bi})}$$

(ii) For efficiency of the vapor capture system,

$$F = \frac{\sum_{i=1}^n (Q_{bi} C_{bi})}{\sum_{i=1}^n (Q_{bi} C_{bi}) + \sum_{k=1}^p (Q_{fk} C_{fk})}$$

[49 FR 26892, June 29, 1984; 49 FR 32848, Aug. 17, 1984, as amended at 65 FR 61768, Oct. 17, 2000]

§ 60.584 Monitoring of operations and recordkeeping requirements.

(a) The owner or operator of an affected facility controlled by a solvent recovery emission control device shall install, calibrate, operate, and maintain a monitoring system which continuously measures and records the VOC concentration of the exhaust vent stream from the control device and shall comply with the following requirements:

(1) The continuous monitoring system shall be installed in a location that is representative of the VOC concentration in the exhaust vent, at least two equivalent stack diameters from the exhaust point, and protected from interferences due to wind, weather, or other processes.

(2) During the performance test, the owner or operator shall determine and record the average exhaust vent VOC concentration in parts per million by volume. After the performance test, the owner or operator shall determine and, in addition to the record made by the continuous monitoring device, record the average exhaust vent VOC concentration for each 3-hour clock period of printing operation when the average concentration is greater than 50 ppm and more than 20 percent greater than the average concentration value demonstrated during the most recent performance test.

(b) The owner or operator of an affected facility controlled by a thermal incineration emission control device shall install, calibrate, operate, and maintain a monitoring device that continuously measures and records the temperature of the control device exhaust gases and shall comply with the following requirements:

(1) The continuous monitoring device shall be calibrated annually and have an accuracy of ± 0.75 percent of the temperature being measured, expressed in degrees Celsius, or ± 2.5 °C, whichever is greater.

(2) During the performance test, the owner or operator shall determine and record the average temperature of the control device exhaust gases. After the performance test, the owner or operator shall determine and record, in addition to the record made by the continuous monitoring device, the average temperature for each 3-hour clock period of printing operation when the average temperature of the exhaust gases is more than 28 °C (50 °F) below the average temperature demonstrated during the most recent performance test.

(c) The owner or operator of an affected facility controlled by a catalytic incineration emission control device shall install, calibrate, operate, and maintain monitoring devices that continuously measure and record the gas temperatures both upstream and downstream of the catalyst bed and shall comply with the following requirements:

(1) Each continuous monitoring device shall be calibrated annually and have an accuracy of ± 0.75 percent of the temperature being measured, expressed in degrees Celsius, or ± 2.5 °C, whichever is greater.

(2) During the performance test, the owner or operator shall determine and record the average gas temperature both upstream and downstream of the catalyst bed. After the performance test, the owner or operator shall determine and record, in addition to the record made by the continuous monitoring device, the average temperatures for each 3-hour clock period of printing operation when the average temperature of the gas stream before the catalyst bed is more than 28 °C below the average temperature demonstrated during the most recent performance test or 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.

(d) The owner or operator of an affected facility shall record time periods of operation when an emission control device is not in use.

[49 FR 26892, June 29, 1984, as amended at 65 FR 61768, Oct. 17, 2000]

§ 60.585 Reporting requirements.

(a) For all affected facilities subject to compliance with §60.582, the performance test data and results from the performance test shall be submitted to the Administrator as specified in §60.8(a).

(b) The owner or operator of each affected facility shall submit semiannual reports to the Administrator of occurrences of the following:

(1) Exceedances of the weighted average VOC content specified in §60.582(a)(1);

(2) Exceedances of the average value of the exhaust vent VOC concentration as defined under §60.584(a)(2);

(3) Drops in the incinerator temperature as defined under §60.584(b)(2); and

(4) Drops in the average temperature of the gas stream immediately before the catalyst bed or drops in the average temperature across the catalyst bed as defined under §60.584(c)(2).

(c) The reports required under paragraph (b) shall be postmarked within 30 days following the end of the second and fourth calendar quarters.

(d) The requirements of this subsection remain in force until and unless the Agency, 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 requirements established by the State.