



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 12, 2009

RE: MonoSol, LLC / 127-27349-00100

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

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

MonoSol, LLC
1701 County Line Road
Portage, Indiana 46368

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

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

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

Operation Permit No.: T127-27349-00100	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 12, 2009 Expiration Date: June 12, 2014

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary Polyvinyl alcohol (PVOH) film manufacturing plant.

Source Address:	1701 County Line Road, Portage, Indiana 46368
Mailing Address:	1701 County Line Road, Portage, Indiana 46368
General Source Phone Number:	(219) 762-3165
SIC Code:	3081
County Location:	Porter
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under Emission Offset Rules Minor Source, under PSD and Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Two (2) bulk resin storage silos (identified as Silo #1 and # 2), each with a maximum storage capacity of 59,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 691 and 692. Construction of these units was completed in 1980.
- (b) One (1) bulk resin storage silo (identified as Silo #3), with a maximum storage capacity of 71,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 693 and 694. Construction of this unit was completed in 2002.
- (c) Two (2) weigh hopper systems (identified as System 1 and 2), each with a maximum storage capacity of 2,000 pounds and a maximum throughput rate of 10,000 pounds per hour, controlled by fabric filters and exhausting at stacks 679, 198, and 690. System 1 and 2 were constructed in 1998 and 2002, respectively.
- (d) Six (6) film casting lines consisting of twelve (12) drying ovens, six (6) mixers, and one (1) swing mixer. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. The swing mixer has a maximum storage capacity of 3,800 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. The swing mixer can be utilized by any line, substituting the current mixer, for operational flexibility. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixers 3 through 5 were constructed in 2001; and mixer 6 was constructed in 2002.

- (e) Twenty-nine (29) hold/run tanks (identified as Tanks #1 through #29). Tanks #1 through #21 each have a maximum capacity of 900 gallons, while Tanks #22 through #29 each have a maximum capacity of 1,300 gallons. Tanks #1 through #7 were installed in 1953; tanks #8 through #13 were installed in 1965; tank #14 was installed in 1967; tanks #15 through #18 were installed in 2001; tanks #19 through #21 were installed in 1967; tanks #22 through #25 were installed in 2001; and tanks #26 through #29 were installed in 2002.
- (f) Nine (9) bulk organic liquid storage tanks, consisting of the following:
 - (1) TEG Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing triethylene glycol and exhausting to an overfill/spill tank. These units were installed in 1965.
 - (2) PEG 200 Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-200 MW and exhausting to an overfill/spill tank. These units were installed in 1965.
 - (3) PEG 300 Tank 1, with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-300 MW and exhausting to an overfill/spill tank. This unit was installed in 1965.
 - (4) Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overfill/spill tank. These units were installed in 1965.
 - (5) Kosher Glycerine Tanks 1 and 2, each with a maximum storage capacity of 5,520 gallons and exhausting to an overfill/spill tank. These units were installed in 2002.

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

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

- (a) Two (2) natural gas-fired boilers (identified as EU1 and EU2), each with a maximum heat input capacity of 8.36 MMBtu per hour, and exhausting at stacks ID 682 and 681, constructed in 2001. [326 IAC 6-2]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T127-27349-00100, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to T127-27349-00100 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

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

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

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

- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

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

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

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

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

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 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 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 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 2-7-6(1)]

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
 - (1) starting in 2004 and every three (3) years thereafter, and
 - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

- (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 start-up, whichever is later.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.

- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

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

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS: Particulate Emissions

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

- (a) Two (2) bulk resin storage silos (identified as Silo #1 and # 2), each with a maximum storage capacity of 59,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 691 and 692. Construction of these units was completed in 1980.
- (b) One (1) bulk resin storage silo (identified as Silo #3), with a maximum storage capacity of 71,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 693 and 694. Construction of this unit was completed in 2002.
- (c) Two (2) weigh hopper systems (identified as System 1 and 2), each with a maximum storage capacity of 2,000 pounds and a maximum throughput rate of 10,000 pounds per hour, controlled by fabric filters and exhausting at stacks 679, 198, and 690. System 1 and 2 were constructed in 1998 and 2002, respectively.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour [326 IAC 2-7-1(21)(G)(I)(AA)(aa)], consisting of:

 Two (2) natural gas-fired boilers (identified as EU1 and EU2), each with a maximum heat input capacity of 8.36 MMBtu per hour, and exhausting at stacks ID 682 and 681, constructed in 2001.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions shall not exceed the pounds per hour limit as shown below:

Emission Units	Process Weight		Particulate Emission Limit (pounds per hour)
	(pounds per hour)	(tons per hour)	
Each of the three (3) resin silos	32,000	16.0	26.3
Each of the two (2) weigh hopper systems	10,000	5.0	12.05

The pound 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
 and P = process weight rate in tons per hour

D.1.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the 8.36 MMBtu per hour natural gas-fired boilers, which were existing and in operation after September 21, 1983, shall each be limited to 0.52 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

Where:

Pt = emission rate limit (lbs. per MMBtu)

Q = total source heat input capacity rating in MMBtu per hour
(16.72 MMBtu per hour)

SECTION D.2 FACILITY OPERATION CONDITIONS: Tanks

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

- (a) Nine (9) bulk organic liquid storage tanks, consisting of the following:
- (1) TEG Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing triethylene glycol and exhausting to an overflow/spill tank. These units were installed in 1965.
 - (2) PEG 200 Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-200 MW and exhausting to an overflow/spill tank. These units were installed in 1965.
 - (3) PEG 300 Tank 1, with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-300 MW and exhausting to an overflow/spill tank. This unit was installed in 1965.
 - (4) Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.
 - (5) Kosher Glycerine Tanks 1 and 2, each with a maximum storage capacity of 5,520 gallons and exhausting to an overflow/spill tank. These units were installed in 2002.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels), the Permittee shall maintain a record and submit to the department a report containing the following information for nine (9) bulk organic storage tanks and the overflow/spill tank.

- (1) The vessel identification;
- (2) The vessel dimensions; and
- (3) The vessel capacity.

SECTION D.3 FACILITY OPERATION CONDITIONS: Film Cast Lines

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

- (a) Six (6) film casting lines consisting of twelve (12) drying ovens, six (6) mixers, and one (1) swing mixer. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. The swing mixer has a maximum storage capacity of 3,800 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. The swing mixer can be utilized by any line, substituting the current mixer, for operational flexibility. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixers 3 through 5 were constructed in 2001; and mixer 6 was constructed in 2002.

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

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

D.3.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1] and Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The HAPs usage limit for Film Cast Lines 5 and 6 shall be less than ten (10) tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month. Compliance with these requirements renders 326 IAC 8-1-6 not applicable.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC and HAP)

Compliance with the VOC and HAP content and usage limitations contained in Condition 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 "as supplied" and "as applied" VOC/HAP 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 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC/HAP input limit established in Condition D.3.1.
- (1) The VOC and HAP content of resin used;
 - (2) The amount of resin used on monthly basis;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC and HAP usage for each month; and
 - (4) The weight of VOCs and HAP emitted for each compliance period.

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

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: MonoSol, LLC
Source Address: 1701 County Line Road, Portage, Indiana 46368
Mailing Address: 1701 County Line Road, Portage, Indiana 46368
Part 70 Permit No.: T127-27349-00100

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: MonoSol, LLC
Source Address: 1701 County Line Road, Portage, Indiana 46368
Mailing Address: 1701 County Line Road, Portage, Indiana 46368
Part 70 Permit No.: T127-27349-00100

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: MonoSol, LLC
Source Address: 1701 County Line Road, Portage, Indiana 46368
Mailing Address: 1701 County Line Road, Portage, Indiana 46368
Part 70 Permit No.: T127-27349-00100
Facility: Film Cast Line 5
Parameter: Single HAP Usage
Limit: Less than ten (10) tons per twelve (12) consecutive month period each

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: MonoSol, LLC
Source Address: 1701 County Line Road, Portage, Indiana 46368
Mailing Address: 1701 County Line Road, Portage, Indiana 46368
Part 70 Permit No.: T127-27349-00100
Facility: Film Cast Line 6
Parameter: Single HAP Usage
Limit: Less than ten (10) tons per twelve (12) consecutive month period each

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MonoSol, LLC
 Source Address: 1701 County Line Road, Portage, Indiana 46368
 Mailing Address: 1701 County Line Road, Portage, Indiana 46368
 Part 70 Permit No.: T127-27349-00100

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	MonoSol, LLC
Source Location:	1701 County Line Road, Portage, Indiana 46368
County:	Porter
SIC Code:	3081
Permit Renewal No.:	T127-27349-00100
Permit Reviewer:	Michael S. Brooks

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from MonoSol, LLC, relating to the operation of a stationary polyvinyl alcohol (PVOH) film manufacturing plant.

History

On January 9, 2009, MonoSol, LLC, submitted an application to the OAQ requesting to renew its operating permit

Permitted Emission Units and Pollution Control Equipment

- (a) Two (2) bulk resin storage silos (identified as Silo #1 and # 2), each with a maximum storage capacity of 59,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 691 and 692. Construction of these units was completed in 1980.
- (b) One (1) bulk resin storage silo (identified as Silo #3), with a maximum storage capacity of 71,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 693 and 694. Construction of this unit was completed in 2002.
- (c) Two (2) weigh hopper systems (identified as System 1 and 2), each with a maximum storage capacity of 2,000 pounds and a maximum throughput rate of 10,000 pounds per hour, controlled by fabric filters and exhausting at stacks 679, 198, and 690. System 1 and 2 were constructed in 1998 and 2002, respectively.
- (d) Six (6) film casting lines consisting of twelve (12) drying ovens, six (6) mixers, and one (1) swing mixer. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. The swing mixer has a maximum storage capacity of 3,800 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. The swing mixer can be utilized by any line, substituting the current mixer, for operational flexibility. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixers 3 through 5 were constructed in 2001; and mixer 6 was constructed in 2002.
- (e) Twenty-nine (29) hold/run tanks (identified as Tanks #1 through #29). Tanks #1 through #21 each have a maximum capacity of 900 gallons, while Tanks #22 through #29 each have a maximum capacity of 1,300 gallons. Tanks #1 through #7 were installed in 1953; tanks #8 through #13 were installed in 1965; tank #14 was installed in 1967; tanks #15 through #18 were installed in 2001; tanks #19 through #21 were installed in 1967; tanks

#22 through #25 were installed in 2001; and tanks #26 through #29 were installed in 2002.

- (f) Nine (9) bulk organic liquid storage tanks, consisting of the following:
- (1) TEG Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing triethylene glycol and exhausting to an overflow/spill tank. These units were installed in 1965.
 - (2) PEG 200 Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-200 MW and exhausting to an overflow/spill tank. These units were installed in 1965.
 - (3) PEG 300 Tank 1, with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-300 MW and exhausting to an overflow/spill tank. This unit was installed in 1965.
 - (4) Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.
 - (5) Kosher Glycerine Tanks 1 and 2, each with a maximum storage capacity of 5,520 gallons and exhausting to an overflow/spill tank. These units were installed in 2002.

Insignificant Activities

- (a) Two (2) natural gas-fired boilers (identified as EU1 and EU2), each with a maximum heat input capacity of 8.36 MMBtu per hour, and exhausting at stacks ID 682 and 681, constructed in 2001. [326 IAC 6-2]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (c) Cooling Tower with a maximum capacity of 240 gpm.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T127-18251-00100 on October 7, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 127-20422-00100 issued on December 20, 2004; and
- (a) Administrative Amendment No. 127-20990-00100 issued on June 23, 2005.

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

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Porter County.

Pollutant	Designation
SO ₂	Cannot be classified for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. The remainder of Porter County is better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
<p>¹Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area, including Porter County, for the 1-hour standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.</p>	

(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 Counties 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, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties 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.

(i) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the

anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996, in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability entire source section.

(ii) 8-hour ozone standard

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

- (b) U.S. EPA, in the Federal Register Notice 70 FR 943, dated January 5, 2005, has designated Porter County as nonattainment for PM2.5. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM2.5 promulgated on May 8, 2008, and effective on July 15, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) Other Criteria Pollutants
Porter County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	45.91
PM ₁₀	46.81
PM _{2.5}	46.81

Pollutant	tons/year
SO ₂	0.1
VOC	248.20
CO	13.7
NO _x	16.3

HAPs	tons/year
methanol	247.05
Total	>10/25

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

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	0
SO ₂	0
VOC	11
CO	5
NO _x	6
HAP	not reported

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

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 federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential to Emit (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Film Cast Lines	0.22	0.22	0.22		215			184.77
Weigh Hoppers	0.31	0.31	0.31					
Cooling Tower	0.01	0.01	0.01					
Combustion	0.3	1.2	1.2	0.1	0.9	13.7	16.3	neg
Silos	0.15	0.15	0.15					
Tanks					0.03			
Total	0.98	1.88	1.88	0.1	215.93	13.7	16.3	184.77
PSD Major Source Threshold	250	250	--	250	--	250	--	NA
Emission Offset Major Source Threshold	--	--	--	--	25	--	100	--
Nonattainment NSR Major Source Threshold	--	--	100	--	--	--	--	--

- (a) This existing stationary source is major for Emission Offset because the emissions of VOC are greater than twenty-five (>25) tons per year.

Federal Rule Applicability

CAM:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
- (1) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	(1) Control Device Used	(2) Emission Limitation (Y/N)	(3) Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Hold Run Tanks (VOC)	none	--	--	--	100	N	--
Film Cast Lines (VOC)	none	--	--	--	100	N	--
Weigh Hoopers System 1 (PM10)	Fabric Filters	yes	15.33	--	100	N	--
Weigh Hoopers System 2 (PM10)	Fabric Filters	yes	15.33	--	100	N	--
Cooling Tower (PM10)	none	--	--	--	100	N	--
Silo #1 (PM10)	bin vent filters	yes	4.91	--	100	N	--
Silo #2 (PM10)	bin vent filters	yes	4.91	--	100	N	--
Silo #3 (PM10)	bin vent filters	yes	4.91	--	100	N	--
OLS Tanks (VOC)	none	--	--	--	100	N	--

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

NSPS:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The storage vessels are not subject to the New Source Performance Standard for 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, (40 CFR Part 60.110b, Subpart Kb) because they do not have a capacity greater than or equal to 75 cubic meters (m³).
- (c) The two (2) natural gas fired boilers, identified as EU1 and EU2, are not subject to the New Source Performance Standard for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60.40b, Subpart Db) because they do not have a heat input capacity from fuels combusted of greater than 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)).
- (d) The two (2) natural gas fired boilers, identified as EU1 and EU2, are not subject to the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60.40c, Subpart Dc) because they do not have a heat input capacity from fuels combusted of greater than 2.9 megawatts (MW) (10 million British thermal units per hour (MMBtu/hr)).
- (e) The source is not subject to the New Source Performance Standard for Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer

Manufacturing Industry (40 CFR Part 60.560, Subpart DDD) because it does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate).

NESHAP:

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-3 (Emission Offset)

On January 26, 1996, in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO_x threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. The source was constructed prior to 1977, and has been modified several times, none of which triggered emission offset applicability. The construction of Film Cast Line 5 in 2001 and Film Cast Line 6 in 2002, which were independent projects, each had a potential to emit of VOC equal to 8.23 tons per year and did not trigger the emission offset rule. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply. However, the source is a major source under 326 IAC 2-3, because the potential to emit of VOC from the entire source is greater than twenty-five (25) tons per year.

326 IAC 2-2 (Prevention of Significant Deterioration)

The total source potential to emit of each criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

326 IAC 2-1.1-5 (Nonattainment NSR)

The total source potential to emit of PM_{2.5} is less than 100 tons per year. Therefore the source is considered minor under nonattainment NSR.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is required to have an operating permit under 326 IAC 2-7, (Part 70). Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1, beginning in 2004 and every three (3) years after because the source does not have the potential to emit equal to or greater than 2,500 tons per year of carbon monoxide, oxides of nitrogen, or sulfur dioxide and it does not have the potential to emit equal to or greater than 250 tons per year of either particulate matter less than or equal to ten (10) micrometers (PM₁₀) or volatile organic compounds (VOC). Therefore, the next emission statement for this source must be submitted by July 1, 2010. However, since this source is located in Porter County, the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

All facilities emitting HAPs at the source were constructed prior to the July 27, 1997 applicability date for this rule, except for two (2) film cast lines (identified as line 5 and line 6). These two lines each have a potential to emit of single HAP equal to 8.23 tons per year. The two (2) film cast lines were considered as independent projects when constructed. The source is changing its material usage from 0.6% methanol content to 3% methanol content; this will increase the potential to emit of HAPs to 41.13 tons per year per line. The unlimited potential to emit of HAPs from line 5 and line 6 is greater than ten (10) tons per year for any single HAP. However, the source shall limit the potential to emit of HAPs from the line 5 and line 6 to less than ten (10) tons per year per line for any single HAP. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1(b)(4)(A), the requirements of 326 IAC 8-6-1 do not apply because the provisions of this section shall not apply to the use of alcohols.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake/Porter/Clark/Floyd Counties)

This source is subject to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake/Porter/Clark/Floyd Counties) because the potential VOC emissions are greater than twenty-five (25) tons per year. However, there are no set requirements for this source.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

State Rule Applicability – Individual Facilities

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

(a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Weigh Hoppers shall not exceed 12.05 pounds per hour when operating at a process weight rate of five (5) tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, the source is able to comply with this limit without the use of controls.

(b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Resin Silos shall not exceed 26.3 pounds per hour each when operating at a process weight rate of sixteen (16) tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, the source is able to comply with this limit without the use of controls.

- (c) Pursuant to 326 IAC 6-3-1(b)(14), the Cooling Tower and the Batch Mixing process are exempt from the requirements of 326 IAC 6-3-2 because the potential to emit for each process is less than 0.551 pounds per hour.
- (d) The twelve (12) natural gas-fired drying ovens are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because particulate emissions from these units are from combustion only.

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

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emissions Limitations), particulate emissions from each of the 6.3 MMBtu/hr boilers shall not exceed 0.56 pounds per million Btu heat input (lb/MMBtu) from each boiler. This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where} \quad Pt = \text{Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.}$$

$Q = \text{Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.}$

The source is able to comply with this limit when burning natural gas.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The unlimited VOC potential emissions from the film casting lines are greater than twenty-five (25) tons per year after the issuance of this permit. The VOC content of the resin used at this source is between the range of 0.6% to 3%. By using the worst-case scenario of 3% methanol content of the resin, the potential to emit from each film cast line is greater than twenty-five (25) tons per year. Film Cast Lines 1 through 4 were constructed prior to the rule applicability date and Film Cast Lines 5 and 6 were constructed after the rule applicability date; however methanol is a VHAP and is the only source of VOC and HAPs emissions from the film cast lines. The source's HAPs usage limit from line 5 and line 6 shall limit the VOC potential emissions from the film casting lines to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

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

The nine (9) storage tanks are subject to 326 IAC 8-9 because they are located in Porter County. Since the storage capacity of each tank is less than 39,000 gallons, the source is subject only to the recordkeeping and reporting requirement in 326 IAC 8-9-6(b). The Permittee shall maintain a record and submit to the department a report containing the following information:

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

Compliance Determination and Monitoring Requirements

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

Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The compliance determination requirements applicable to Film Cast Lines 5 and 6 are as follows:

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 "as supplied" and "as applied" VOC data sheets.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on January 9, 2009.

Conclusion

The operation of this stationary polyvinyl alcohol (PVOH) film manufacturing plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T127-27349-00100.

Appendix A: Emissions Calculations

Batch Mixing

Company Name: MonoSol LLC

Address City IN Zip: 1701 County Line Road, Portage IN 46368

Permit Number: T127-27349-00100

Reviewer: Michael S. Brooks

Date: 3/10/2009

Emission Unit: Batch Making

Source description: Preparation of batch slurry mixture (liquid and solids) that is pumped to casting line systems for drying.
Potential particulate emissions are due to addition of dry powder from 50 lb bags to liquid in a mixing tank.

OPERATION/PRODUCTION RELATED INFORMATION

<i>Parameter</i>	<i>value</i>	<i>units</i>	<i>Reference</i>
Solids additions to product slurry mixture	400	lbs	approx. eight 50 lbs bags
Number of mixers	6	-	plant design
Maximum number of batches per day per mixer-line	5	batches/day	process design specification
Maximum number of batches - plant wide	10,950	batches/yr	calculated value

EMISSION RELATED INFORMATION AND CALCULATION METHODOLOGY

PM/PM₁₀ emissions are caused by adding dry powder (manual bag dumping) to the mixing vessel. Liquid is already present in the mixing tank and the mixing impellers are engaged creating a vortex to which the solids are added, minimizing dust loss.

No dust attenuation is claimed, thus, potential PM/PM₁₀ emissions equal what dust escapes the mixers.

<i>Pollutant</i>	<i>value</i>	<i>units</i>	<i>Reference</i>
PM/PM ₁₀ - solids (dust) loss due to handling/dumping	0.001	wt. pct.	Amount of loss from dry materials being handled (IDEM factor used in TSD to Permit T163-7142-00015)
	0.01	wt. pct.	IDEM factor, plus order of magnitude safety factor

POTENTIAL EMISSION CALCULATIONS - calculated at 5 batches/day per each of 6 mixers, 365 days/yr).

Pollutant	Potential Emissions	
	lbs/batch	tpy
PM/PM ₁₀ - uncontrolled loss into the building	0.04	0.22

Appendix A: Emissions Calculations**Mix Ribbon Blender and Hold/Run Tanks per Line****Company Name: MonoSol LLC****Address City IN Zip: 1701 County Line Road, Portage IN 46368****Permit Number: T127-27349-00100****Reviewer: Michael S. Brooks****Date: 3/10/2009**

Batch solution consumption rate: 4.8 hours (approx.)
 Max. potential cast line operation 8760 hours/yr
 Max. number of batches per line 1825 batch/line-yr

Pollutant: Emission Factors:
 VOC mixer: 4.62E-03 lb/batch
 HAP (methanol) mixer: 0.0012 lb/batch
 VOC - hold/run tank 8.80E-02 lb/batch
 HAP (methanol) hold/run tank: 0.05 lb/batch

Mixer emissions:, per line	
VOC:	9.63E-04 lbs/hr
	4.22E-03 tons/yr
Methanol (HAP):	2.50E-04 lbs/hr
	1.10E-03 tons/yr

Hold/run tanks:, per line	
VOC:	0.018 lbs/hr
	0.080 tons/yr
Methanol (HAP):	0.010 lbs/hr
	0.046 tons/yr

- 1/ VOC emissions result from the liquid organic materials contained in the batch material. The mixers mix and heat the liquid plasticizers.
- 2/ Emission rate of VOC and HAP were determined by the source using Ideal Gas Law principles.
- 3/ Material used for the calculation above represents the worse case scenario in terms of VOC/HAP emissions

METHODOLOGY

PTE (tons/year) = Max. no of batches per line per year * Emission rate (lb/batch) * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Weigh Hoppers per Line**

Company Name: MonoSol LLC
Address City IN Zip: 1701 County Line Road, Portage IN 46368
Permit Number: T127-27349-00100
Reviewer: Michael S. Brooks
Date: 3/10/2009

Max. sack to weigh hopper transfer rate: 4,000 lbs/hr per each system
 8,000 lbs/hr total for two systems

Max. silo to weigh hopper transfer rate: 10,000 lbs/hr per each system
 20,000 lbs/hr total for two systems

*Emission Calculation basis:
 PM total/PM₁₀ (controlled) 0.007 lbs/ton

Pollutant:
 PM total/PM₁₀ (controlled): 0.035 lbs/hr, per line
 0.15 tons/yr, per line

PM total/PM₁₀ (uncontrolled) 3.5 lbs/hr, per line
 15.33 tons/yr, per line

Assume all PM₁₀ emissions are equal to PM.
 Control = Fabric filters with 99 % efficiency
 * Emission factor is from AP-42, Chapter 11.26 (Talc Processing), Table 11.26-1 SCC 3-05-089-85 (November, 1995).

METHODOLOGY

Controlled PTE of PM/PM10 (lbs/hour) = Max. Transfer Rate (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs
 Controlled PTE of PM/PM10 (tons/year) = Max. Transfer Rate (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs * 8760 hours/year * 1 ton/2000 lbs
 Uncontrolled PTE of PM/PM10 (lbs/hour) = Max. Transfer Rate (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs * 1/(1 - Control Efficiency %)
 Uncontrolled PTE of PM/PM10 (tons/year) = Max. Transfer Rate (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs * 1/(1 - Control Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations

Film Cast Lines

Company Name: MonoSol LLC

Address City IN Zip: 1701 County Line Road, Portage IN 46368

Permit Number: T127-27349-00100

Reviewer: Michael S. Brooks

Date: 3/10/2009

Maximum raw PVOH resin consumption rate: 313 lbs/hr
As-employed resin methanol content: 3 Weight %

Calculations:

313 lbs/hr 0.03 lb methanol content per lb PVOH = 9.39 lbs/hr, per line
41.13 tpy, per line

- 1/ VOC emissions result from the drying of the PVOH film solution and volatization of the free methanol contained in the solution.
- 2/ Material used for the calculation above represents the worse case scenario in terms of VOC/HAP emissions because it has the highest solution/resin consumption rate of all the products.

METHODOLOGY

PTE of VOC/Methanol (ton/year) = Max. throughput rate (lb/hour) * Weight % VOC/Methanol * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations

Cooling Tower

Company Name: MonoSol LLC

Address City IN Zip: 1701 County Line Road, Portage IN 46368

Permit Number: T127-27349-00100

Reviewer: Michael S. Brooks

Date: 3/10/2009

Emission Unit: Non-Contact Water Cooling Tower

Source description: Potential emissions due to release of dissolved solids in total drift from water recirculation stream.

OPERATION/PRODUCTION RELATED INFORMATION

<i>Parameter</i>	<i>value</i>	<i>units</i>	<i>Reference</i>
Type of cooling tower	Counter-current, blow-through		
Total circulating flow rate	240	gal/min	equipment design specification
	14,400	gal/hr	
Cooling tower drift (pct of recirculation flow)	0.002	percent	worse case - vendor claims zero drift
Total cooling tower drift	0.29	gal/hr	calculated value
	2.4	lbs/hr	calc value (density = 8.345 lbs/gal)

EMISSION RELATED INFORMATION AND CALCULATION METHODOLOGY

PM/PM₁₀ emissions calculated based on the total dissolved solids (TDS) content of recirculating water and resulting drift.

Calculation method taken from AP-42, Section 13.4.

<i>Pollutant</i>	<i>value</i>	<i>units</i>	<i>Reference</i>
TDS content of water used in cooling tower	1,050	ppm	max TDS expected from water source after being concentrated at 5 cycles

POTENTIAL EMISSION CALCULATIONS - calculated at 8,760 hrs/yr

Pollutant	Potential Emissions	
	lbs/hr	tpy
PM/PM ₁₀	0.003	0.011

$= 14,400 \text{ gal/hr water flow} \times 0.002 \text{ gal water drift/100 gal water reirculated}; = 0.29 \text{ gal/hr water drift} \times 8.345 \text{ lbs/gal water}; = 2.4 \text{ lbs/hr water drift}$
 $= 2.4 \text{ lbs/hr water drift} \times 1,050 \text{ lbs TDS per } 1,000,000 \text{ lbs water}; = 0.003 \text{ lb/hr PM/PM}_{10} \text{ (TDS in water represents the PM/PM}_{10})$

Alternatively --

$= 0.29 \text{ gal/hr water drift} \times 3.785 \text{ L/gal} \times 1,050 \text{ mg/L TDS} \times 1 \text{ lb/454,000 mg}; = 0.003 \text{ lb/hr PM/PM}_{10}$

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

EU1 Boiler 8.36 MMBtu/hr, EU2 Boiler 8.36 MMBtu/hr, and twelve (12) dryer ovens 1.7 MMBtu/hr each.

**Company Name: MonoSol LLC
Address City IN Zip: 1701 County Line Road, Portage IN 46368
Permit Number: T127-27349-00100
Reviewer: Michael S. Brooks
Date: 3/10/2009**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

37.1

325.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.3	1.2	0.1	16.3	0.9	13.7

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See page 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

EU1 Boiler 8.36 MMBtu/hr, EU2 Boiler 8.36 MMBtu/hr, and twelve (12) dryer ovens 1.7 MMBtu/hr each.

HAPs Emissions

**Company Name: MonoSol LLC
Address City IN Zip: 1701 County Line Road, Portage IN 46368
Permit Number: T127-27349-00100
Reviewer: Michael S. Brooks
Date: 3/10/2009**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.414E-04	1.951E-04	1.219E-02	2.927E-01	5.528E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.129E-05	1.788E-04	2.276E-04	6.178E-05	3.414E-04

Methodology is the same as page 6.

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

**Appendix A: Emission Calculations
PM/PM10 Emissions
From Three (3) Bulk PVOH Resin Silos**

**Company Name: MonoSol LLC
Address City IN Zip: 1701 County Line Road, Portage IN 46368
Permit Number: T127-27349-00100
Reviewer: Michael S. Brooks
Date: 3/10/2009**

Emission Unit	Max. Throughput Rate total 3 silos (lbs/hour)	* Emission Factor (lb/ton)	Controlled PTE of PM/PM10 total 3 silos (lbs/hour)	Controlled PTE of PM/PM10 total 3 silos (tons/year)	Control Efficiency %	Uncontrolled PTE of PM/PM10 total 3 silos (tons/year)	Uncontrolled PTE of PM/PM10 per silo (lbs/hour)
PVOH Resin Silos	96000	0.0007	0.034	0.147	99%	14.7	1.12

TOTAL

Assume all PM emissions are equal to PM10.

Control = Bin vent filters with 99 % efficiency

* There are no emission factors available for PVOH resin handling. Therefore, worst case emission factor from AP-42, Chapter 11.26 (Talc Processing), Table 11.26-1 SCC 3-05-089-85 (November 1995) was used by assuming only 10% of PM/PM10 was emitted during truck to silo off load rate.

METHODOLOGY

Controlled PTE of PM/PM10 (lbs/hour) = Max. Throughput Rate of Resin (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs

Controlled PTE of PM/PM10 (tons/year) = Max. Throughput Rate of Resin (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs * 8760 hours/year * 1 ton/2000 lbs

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

Uncontrolled PTE of PM/PM10 (lbs/hour) = Max. Throughput Rate of Resin (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs * 1/(1 - Control Efficiency %)

**Appendix A: Emission Calculations
Tank VOC Emissions - Maximum PTE**

Company Name: MonoSol LLC
Address City IN Zip: 1701 County Line Road, Portage IN 46368
Permit Number: T127-27349-00100
Reviewer: Michael S. Brooks
Date: 3/10/2009

Tank Number	Tank ID Number	Product Stored	Losses (Pounds per Year)		Total VOC lbs/yr
			Standing	Working	
1	TEG Tank 1	Triethylene Glycol	0.05	0.08	0.12
2	TEG Tank 2	Triethylene Glycol	0.05	0.08	0.12
3	PEG 200 Tank 1	Poluethylene Glycol-200 MW	0.12	0.1	0.22
4	PEG 200 Tank 2	Poluethylene Glycol-200 MW	0.12	0.1	0.22
5	PEG 300 Tank 1	Poluethylene Glycol-300 MW	0.26	0.15	0.41
6	Glycerine Tank 1	Glycerine	8.33	4.69	13.02
7	Glycerine Tank 2	Glycerine	8.33	4.69	13.02
8	Kosher Glycerine Tank 1	Kosher Glycerine	8.33	4.69	13.02
9	Kosher Glycerine Tank 2	Kosher Glycerine	8.33	4.69	13.02
Total VOC			33.92	19.27	53.17
				Total VOC tons/yr:	0.03

Note: All storage tank emissions estimated using EPA's TANKS 4.0.9d software program.

**Appendix A: Emission Calculations
Summary**

Company Name: MonoSol LLC
Address City IN Zip: 1701 County Line Road, Portage IN 46368
Permit Number: T127-27349-00100
Reviewer: Michael S. Brooks
Date: 3/10/2009

Uncontrolled

	PM	PM10	SO2	NOx	VOC	CO	HAP
Mixing	0.22	0.22					
Mix Blender					0.03		0.01
Hold Run Tanks					0.48		0.27
Film Cast Lines					246.77		246.77
Weigh Hoppers	30.66	30.66					
Cooling Tower	0.01	0.01					
Combustion Units	0.30	1.20	0.10	16.30	0.90	13.70	negligible
Silos	14.72	14.72					
OLS Tanks					0.03		
Total	45.91	46.81	0.10	16.30	248.20	13.70	247.05

**Appendix A: Emission Calculations
Summary**

Company Name: MonoSol LLC
Address City IN Zip: 1701 County Line Road, Portage IN 46368
Permit Number: T127-27349-00100
Reviewer: Michael S. Brooks
Date: 3/10/2009

Controlled/Limited

	PM	PM10	SO2	NOx	VOC	CO	HAP
Mixing	0.22	0.22					
Mix Blender					0.03		0.01
Hold Run Tanks					0.48		0.27
Film Cast Lines					214.49		184.49
Weigh Hoppers	0.31	0.31					
Cooling Tower	0.01	0.01					
Combustion Units	0.30	1.20	0.10	16.30	0.90	13.70	negligible
Silos	0.15	0.15					
OLS Tanks					0.03		
Total	0.98	1.88	0.10	16.30	215.93	13.70	184.77



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Melanie Kroczek
MonoSol, LLC
1701 County Line Rd
Portage, IN 46368

DATE: June 12, 2009

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

SUBJECT: Final Decision
Title V - Renewal
127-27349-00100

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Tim Boyle (Dir. of Global Operations)
Leah Pullin (E. Vironment. LP)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Toll Free (800) 451-6027
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June 12, 2009

TO: Portage Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: MonoSol, LLC
Permit Number: 127-27349-00100

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 6/12/2009 MonoSol, LLC 127-27349-00100 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Melanie C Kroczek MonoSol, LLC 1701 County Line Rd Portage IN 46368 (Source CAATS) via confirmed delivery										
2		Tim Boyle Dir of Global Ops MonoSol, LLC 1701 County Line Rd Portage IN 46368 (RO CAATS)										
3		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
4		Portage Public Library 2665 Irving Street Portage IN 46368 (Library)										
5		Porter County Board of Commissioners 155 Indiana Ave Valparaiso IN 46383 (Local Official)										
6		Porter County Health Department 155 Indiana Ave, Suite 104 Valparaiso IN 46383-5502 (Health Department)										
7		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
8		Mr. Ed Dybel 2440 Schrage Avenue Whiting IN 46394 (Affected Party)										
9		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
10		Mr. Dee Morse National Park Service 12795 W Alameda Pky, P.O. Box 25287 Denver CO 80225-0287 (Affected Party)										
11		Mr. Joseph Virgil 128 Kinsale Avenue Valparaiso IN 46385 (Affected Party)										
12		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
13		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
14		Leah Pullin E.Vironment, L.P. 14011 Park Drive, Suite 100 Tomball TX 77377 (Consultant)										
15		Eric & Sharon Haussman 57 Shore Drive Ogden Dunes IN 46368 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
14			

Mail Code 61-53

IDEM Staff	MIDENNEY 6/12/2009 MonoSol, LLC 127-27349-00100 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Portage City Council and Mayors Office 6070 Central Ave Portage IN 46368 (Local Official)										
2		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
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Total number of pieces Listed by Sender 2	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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