



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: December 17, 2009
RE: Silgan White Cap Corporation / 177-27766-00001
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

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

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Silgan White Cap Corporation
1701 Williamsburg Pike
Richmond, Indiana 47375**

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

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

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

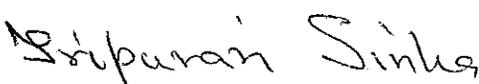
Operation Permit No.: T 177-27766-00001	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 17, 2009 Expiration Date: December 17, 2014

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Stratospheric Ozone Protection

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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 a fabrication of metals products plant.

Source Address:	1701 Williamsburg Pike, Richmond, Indiana 47375
Mailing Address:	1701 Williamsburg Pike, Richmond, IN 47375
General Source Phone Number:	(765) 983-9278
SIC Code:	3466, 3469 & 3559
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor 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) One (1) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S5.
- (b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, an offset lithographic press and a natural gas fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S8.
- (c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S10.
- (d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, one (1) offset lithographic press, and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, exhausting to stack S12, and one (1) offset lithographic press with a maximum capacity of 4500 sheets per hour and an electric UV oven which vent inside the plant.
- (e) Two (2) 10.5 mmBtu/hr boilers, identified as Boiler-2 and Boiler 3, both installed in 1969, each capable of combusting either natural gas or No. 2 fuel oil, with no controls, and exhausting to stack S1.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

- (a) Eight (8) plastisol closure gasket curing line, identified as plastisol, consisting of one natural gas-fired curing oven, with no controls, and exhausting to stack S20.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T 177-27766-00001, 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 July 1 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, 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 Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by the "responsible official" need only reference the date of the original report.

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

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

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

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

- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T 177-27766-00001 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) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

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

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

- (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.

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 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) One (1) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S5.
- (b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, an offset lithographic press and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S8.
- (c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S10.
- (d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, one (1) offset lithographic press, and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S12, and one (1) offset lithographic press with a maximum capacity of 4500 sheets per hour and an electric UV oven which vent inside the plant.
- (e) Two (2) 10.5 mmBtu/hr boilers, identified as Boiler-2 and Boiler-3, both installed in 1969, each capable of combusting either natural gas or No. 2 fuel oil, with no controls, and exhausting to stack S1.

Specifically Regulated Insignificant Activity [326 IAC 2-7-1(21)]:

- (f) Eight (8) plastisol closure gasket curing lines, identified as plastisol, consisting of one natural gas-fired curing oven for each line, with no controls, and exhausting to stack S20.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-3]

- (a) Pursuant to 326 IAC 8-2-3(b)(1) (Can Coating Operations), no owner or operator of a can coating line involved in sheet basecoat (exterior and interior) and overvarnish, may cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 0.34 kilograms per liter of coating (2.8 pounds per gallon) excluding water, after controls, delivered to the coating applicator.
- (b) Pursuant to 326 IAC 8-1-2 (b), the coating lines # 1 through 4 VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

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

Where: L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (2.8 lb/gal);
D = Density of VOC in coating in pounds per gallon of VOC (7.36 lb/gal);
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

$$E = L / (1 - (L/D)) = 2.8 / (1 - (2.8 / 7.36)) = 4.52$$

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than E determined in (b) above.
- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

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

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied (21.92 lb/gal).

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied (4.52 lb/gal).

O = Equivalent overall efficiency of the capture system and control device as a percentage.

$$O = \frac{V - E}{V} \times 100 = (21.92 - 4.52) / 21.92 \times 100 = 79.4$$

The overall efficiency of the thermal oxidizer shall be greater than 79.4%.

D.1.2 PSD Minor Limit [326 IAC 2-2]

VOC emissions from Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents shall be limited to less than 248 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit combined with the potential emissions of other emission units will limit the source-wide VOC PTE to less than 250 tons per 12 consecutive month period and will render 326 IAC 2-2 (PSD) not applicable to the entire source.

D.1.3 VOC Usage Limit Determination

Compliance with the VOC emission limit in Condition D.1.2 shall be determined by the following equation:

$$A = ((F_1 * (1 - G_1)) + (F_2 * (1 - G_2)) + (F_3 * (1 - G_3)) + (F_4 * (1 - G_4))) + B + C \quad \text{Where}$$

A = VOC emissions in tons per month

F₁ = VOC usage in tons per month from coating line Coat-1

- F₂ = VOC usage in tons per month from coating line Coat-2
- F₃ = VOC usage in tons per month from coating line Coat-3
- F₄ = VOC usage in tons per month from coating line Coat-4
- B = VOC emissions in tons per month from the eight (8) plastisol curing lines
- C = VOC emissions in tons per month from clean-up solvents
- G₁ = Overall VOC control efficiency of Coat-1 oxidizer (from the latest IDEM approved stack test)
- G₂ = Overall VOC control efficiency of Coat-2 oxidizer (from the latest IDEM approved stack test)
- G₃ = Overall VOC control efficiency of Coat-3 oxidizer (from the latest IDEM approved stack test)
- G₄ = Overall VOC control efficiency of Coat-4 oxidizer (from the latest IDEM approved stack test)

D.1.4 Hazardous Air Pollutants (HAP) Minor Limits [40 CFR 63]

- (a) Single Hazardous Air Pollutant (HAP) emissions from Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents shall be limited to less than 9.9 tons per twelve consecutive month period with compliance determined at the end of each month.
- (b) Combined Hazardous Air Pollutant (HAP) emissions from Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents shall be limited to less than 24.7 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limits combined with the potential emissions of other emission units will limit the source-wide Single HAPs PTE to less than 10 tons per 12 consecutive month period and the source-wide Combined HAPs PTE to less than 25 tons per 12 consecutive month period and will render 326 IAC 2-2 (PSD) not applicable to the entire source. Compliance with these limits shall make the source an area source for HAPs.

D.1.5 HAP Usage Limit Determinations

Compliance with the HAP emission limits in Condition D.1.4 shall be determined by the following equations:

Equation 1: Single HAP Input Limit

$$H = ((J_1 * (1 - K_1)) + (J_2 * (1 - K_2)) + (J_3 * (1 - K_3)) + (J_4 * (1 - K_4))) + L + M \quad \text{Where}$$

- H = Single HAP emissions in tons per month
- J₁ = Single HAP usage in tons per month from coating line Coat-1
- J₂ = Single HAP usage in tons per month from coating line Coat-2
- J₃ = Single HAP usage in tons per month from coating line Coat-3
- J₄ = Single HAP usage in tons per month from coating line Coat-4
- L = Single HAP emissions in tons per month from the eight (8) plastisol curing lines
- M = Single HAP emissions in tons per month from clean-up solvents
- K₁ = Overall HAP control efficiency of Coat-1 oxidizer (from the latest IDEM approved stack test)
- K₂ = Overall HAP control efficiency of Coat-2 oxidizer (from the latest IDEM approved stack test)
- K₃ = Overall HAP control efficiency of Coat-3 oxidizer (from the latest IDEM approved stack test)
- K₄ = Overall HAP control efficiency of Coat-4 oxidizer (from the latest IDEM approved stack test)

Equation 2: Total Combined HAP Input Limit

$$N = ((P_1 * (1 - Q_1)) + (P_2 * (1 - Q_2)) + (P_3 * (1 - Q_3)) + (P_4 * (1 - Q_4))) + R + S \quad \text{Where}$$

- N = Combined HAP emissions in tons per month
- P₁ = Combined HAP usage in tons per month from coating line Coat-1
- P₂ = Combined HAP usage in tons per month from coating line Coat-2
- P₃ = Combined HAP usage in tons per month from coating line Coat-3

- P_4 = Combined HAP usage in tons per month from coating line Coat-4
 R = Combined HAP emissions in tons per month from the eight (8) plastisol curing lines
 S = Combined HAP emissions in tons per month from clean-up solvents
 Q_1 = Overall HAP control efficiency of Coat-1 oxidizer (from the latest IDEM approved stack test)
 Q_2 = Overall HAP control efficiency of Coat-2 oxidizer (from the latest IDEM approved stack test)
 Q_3 = Overall HAP control efficiency of Coat-3 oxidizer (from the latest IDEM approved stack test)
 Q_4 = Overall HAP control efficiency of Coat-4 oxidizer (from the latest IDEM approved stack test)

D.1.6 Catalytic Oxidizer Operation

The catalytic oxidizers for coating lines, Coat-1, Coat-2, Coat-3, and Coat-4 shall be in operation whenever the associated coating line is in operation.

D.1.7 Particulate Matter (PM) [326 IAC 6-2-3(3)(d)]

Pursuant to 326 IAC 6-2-3 (3)(d), Particulate emission limitations for particulate matter emissions from the two (2) 10.5 mmBtu per hour boilers shall be limited to 0.8 pounds per mmBtu.

D.1.8 Particulate [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Process), the particulate emission rate from each plastisol line shall not exceed 3.57 pounds per hour when operating at a process weight rate of 1630 pounds per hour.

This emission limitation was calculated using 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:

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

D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform destruction efficiency testing for VOC and HAPs for coating lines Coat-3 and Coat-4 catalytic oxidizers utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of last valid compliance demonstration.
- (b) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform destruction efficiency testing within 180 days of startup for VOC and HAPs for coating lines Coat-1 and Coat-2 catalytic oxidizers utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of last valid compliance demonstration.
- (c) The capture efficiency test shall be repeated for the catalytic oxidizers in this section whenever a reconfiguration or change in the design of that equipment is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of this equipment, which include any of the following:
 - (1) Modification to the coaters;

- (2) Increasing or decreasing the volumetric flow rate from the ovens
- (3) Changing the static duct pressure.
- (d) Testing shall be conducted in accordance with Section C – Performance Testing.

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

D.1.11 Catalytic Oxidizer Temperature [40 CFR 64]

A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour block average temperature. The Permittee shall operate the catalytic oxidizers for each coating line at or above the 3-hour block average temperatures, from the latest IDEM approved stack test.

A reading that is below the temperature as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered as a deviation from the permit.

D.1.12 Visible Emissions Notations

- (a) Visible emission notations of the two (2) boilers stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere and burning fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water on monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The volume weighted VOC content of the coatings used for each month; and
- (4) The cleanup solvent usage for each month.
- (5) The total VOC usage for each month.
- (b) To document compliance with the single and combined HAP limits in Condition D.1.4, the Permittee shall be required to maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established for this source.
 - (1) The amount and HAP content of each coating material and solvent used. Records shall include inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use.
 - (3) The single and combined HAP usage for each month.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain a log of catalytic oxidizer temperatures.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain records of daily visible emission notations of the stack S1 exhaust, during times when fuels other than natural gas are combusted. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).
- (e) To verify compliance with D.1.10(c), the Permittee shall record duct pressure for the catalytic oxidizers at least once per day to verify compliance with the duct pressure determined at the last capture efficiency test. If duct pressure readings indicate a fundamental change has taken place in the operation of this equipment, a new capture efficiency test shall be performed.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-1.1-1(1).

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

Source Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47375
Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375
Part 70 Permit No.: T 177-27766-00001

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: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47375
Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375
Part 70 Permit No.: T 177-27766-00001

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) daytime 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: Silgan Closures, LLC
 Source Address: 1701 Williamsburg Pike, Richmond, IN 47375
 Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375
 Part 70 Permit No.: T177-27766-00001
 Facility: Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents
 Parameter: VOC
 Limit: VOC emissions from Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents shall be limited to less than 248 tons per twelve consecutive month period with compliance determined at the end of each month.

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: Silgan Closures, LLC
Source Address: 1701 Williamsburg Pike, Richmond, IN 46375
Mailing Address: 1701 Williamsburg Pike, Richmond, IN 46375
Part 70 Permit No.: T177-27766-00001
Facility: Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents
Parameter: Single HAPs
Limit: Single Hazardous Air Pollutant (HAP) emissions from Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents shall be limited to less than 9.9 tons per twelve consecutive month period with compliance determined at the end of each month.

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: Silgan Closures, LLC
 Source Address: 1701 Williamsburg Pike, Richmond, IN 46375
 Mailing Address: 1701 Williamsburg Pike, Richmond, IN 46375
 Part 70 Permit No.: T177-27766-00001
 Facility: Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents
 Parameter: Combined HAPs
 Limit: Combined Hazardous Air Pollutant (HAP) emissions from Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents shall be limited to less than 24.7 tons per twelve consecutive month period with compliance determined at the end of each month.

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: Silgan White Cap Corporation
 Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47375
 Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375
 Part 70 Permit No.: T 177-27766-00001

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. 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".	
<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:	Silgan White Cap Corporation
Source Location:	1701 Williamsburg Pike, Richmond, IN 47375
County:	Wayne
SIC Code:	3466, 3469 & 3559
Permit Renewal No.:	T 177-27766-00001
Permit Reviewer:	Heath Hartley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Silgan White Cap Corporation relating to the operation of a fabrication of metals products plant.

History

On April 14, 2009, Silgan White Cap Corporation submitted an application to the OAQ requesting to renew its operating permit. Silgan White Cap Corporation was issued a Part 70 Operating Permit Renewal on January 14, 2005.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S5.
- (b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, an offset lithographic press and a natural gas fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S8.
- (c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S10.
- (d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, one (1) offset lithographic press, and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, exhausting to stack S12, and one (1) offset lithographic press with a maximum capacity of 4500 sheets per hour and an electric UV oven which vent inside the plant.
- (e) Two (2) 10.5 mmBtu/hr boilers, identified as Boiler-2 and Boiler 3, both installed in 1969, each capable of combusting either natural gas or No. 2 fuel oil, with no controls, and exhausting to stack S1.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr;
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface (Machine Shop);
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Cold Cleaners);
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment or welding equipment;
- (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (j) Quenching operations used heat treating processes (Oil quench in Machine Shop);
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment (Roto-Clone and other systems throughout the plant.);
- (l) Process vessel degassing and cleaning to prepare for internal repairs;
- (m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (n) Paved and unpaved roads and parking lots with public access;
- (o) Asbestos abatement projects regulated by 326 IAC 14-10;
- (p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (q) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling tower;
- (r) On-site fire and emergency response training approved by the department;
- (s) Diesel generators not exceeding 1600 horsepower (One at 158 hp);
- (t) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per

minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations. (Machine Shop and Maintenance Shop);

- (u) A laboratory as defined in 326 IAC 2-7-1(21)(C);
- (v) Isophorone bubbling;
- (w) PVC extrusion and molding;
- (x) The following tanks: #498 (MIBK), #499 (Xylene), #533 (Isophorone), #633 (Reclaim Solvent), #2675 (Varnish) and #D001 (Waste Solvent); and
- (y) Eight (8) plastisol closure gasket curing line, identified as plastisol, consisting of one natural gas-fired curing oven, with no controls, and exhausting to stack S20.
- (z) One (1) mixing room, constructed in 1967.
- (aa) One (1) PVC and EVA regrind area, constructed in 1967.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T 177-17668-00001 on January 14, 2005, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 177-21807-00001 issued on December 12, 2005; and
- (b) Significant Permit Modification No. 177-22408-00001 issued on August 10, 2006.

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

The following terms and conditions from previous approvals have been revised in this Part 70 Operating Permit Renewal:

- (a) The PSD Minor Limit condition was revised. The boiler and catalytic oxidizer limits, D.1.2(b), were removed from the permit because only D.1.2 is sufficient to limit the source-wide VOC emissions to less than 250 tons per year. Conditions D.1.3 and D.1.5 were added to verify the usage limit determination.
- (b) The Permittee has stated that Coat-1 and Coat-2 lines have been temporarily turned off. Therefore, the testing requirements, D.1.7, have been modified to change testing timeframe from every five years to within 180 days of re-start of these two lines.
- (c) The Testing Requirements section has been modified to change testing from every 2.5 years to every 5 years.
- (d) The Particulate limit, 326 IAC 6-3-2(e), has been included in this permit. It was left out of the last permit modification. Also, based on a process weight rate of 1630 pounds per hour, the rate of emission is 3.57 lb/hr, not 2.736 lb/hr.

Enforcement Issue

There are no enforcement actions pending.

County Attainment Status

The source is located in Wayne County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Wayne County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Wayne County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO and Lead (Pb). 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	3.76
PM ₁₀	4.46
PM _{2.5}	4.46
SO ₂	0.1
VOC	1593
CO	11.6
NO _x	13.8
Single HAP	> 10
Total HAP	> 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or 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 any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

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	SO ₂	VOC	CO	NO _x
Emissions from entire source	< 250	< 250	< 250	< 250	< 250	< 250
Major Source Threshold	250	250	250	250	250	250

- (a) This existing stationary source is not major for PSD because the PTE of each regulated pollutant is less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

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

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

Emission Unit / Pollutant		Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Coat-1	VOC	Catalytic Oxidizer	Y	396.17	59.5	100	Y	N
	MIK			80.77	< 10	10	Y	N
	Total HAP			209.98	< 25	25	Y	N
Coat-2	VOC	Catalytic Oxidizer	Y	398.04	59.7	100	Y	N
	MIK			65.39	< 10	10	Y	N
	Total HAP			169.99	< 25	25	Y	N
Coat-3	VOC	Catalytic Oxidizer	Y	398.78	59.8	100	Y	N
	MIK			60.0	< 10	10	Y	N
	Total HAP			155.99	< 25	25	Y	N
Coat-4	VOC	Catalytic Oxidizer	Y	398.78	59.8	100	Y	N
	MIK			60.0	< 10	10	Y	N
	Total HAP			155.99	< 25	25	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the Coating Lines (Coat-1, Coat-2, Coat-3 & Coat-4) for VOC and Single/Combination HAPs upon issuance of the Title V Renewal.

- (b) Boiler 2 and Boiler 3 constructed in 1969 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc), because construction commenced prior to June 9, 1989.
- (c) This source is not subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Metal Can Surface Coating (Subpart KKKK), because the total source potential to emit of a single and any combination of HAPs are limited to less than ten (10) and less than twenty-five (25) tons per year, respectively, making it an area source of HAPs.
- (d) This source is not subject to the requirements of the National Emission standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM, for the Surface Coating of Miscellaneous Metal Parts and Products, because the total source potential to emit of a single and any combination of HAPs are limited to less than ten (10) and less than twenty-five (25) tons per year, respectively, making it an area source of HAPs.

(e) HAPs Minor Source Limit [40 CFR 63]

Equation 1: Single HAP Input Limit

$$H = ((J_1 * (1 - K_1)) + (J_2 * (1 - K_2)) + (J_3 * (1 - K_3)) + (J_4 * (1 - K_4))) + L + M \quad \text{Where}$$

H = Single HAP emissions in tons per month
J₁ = Single HAP usage in tons per month from coating line Coat-1
J₂ = Single HAP usage in tons per month from coating line Coat-2
J₃ = Single HAP usage in tons per month from coating line Coat-3
J₄ = Single HAP usage in tons per month from coating line Coat-4
L = Single HAP emissions in tons per month from the eight (8) plastisol curing lines
M = Single HAP emissions in tons per month from clean-up solvents
K₁ = Overall HAP control efficiency of Coat-1 oxidizer (from the latest IDEM approved stack test)
K₂ = Overall HAP control efficiency of Coat-2 oxidizer (from the latest IDEM approved stack test)
K₃ = Overall HAP control efficiency of Coat-3 oxidizer (from the latest IDEM approved stack test)
K₄ = Overall HAP control efficiency of Coat-4 oxidizer (from the latest IDEM approved stack test)

Equation 2: Total Combined HAP Input Limit

$$N = ((P_1 * (1 - Q_1)) + (P_2 * (1 - Q_2)) + (P_3 * (1 - Q_3)) + (P_4 * (1 - Q_4))) + R + S \quad \text{Where}$$

N = Combined HAP emissions in tons per month
P₁ = Combined HAP usage in tons per month from coating line Coat-1
P₂ = Combined HAP usage in tons per month from coating line Coat-2
P₃ = Combined HAP usage in tons per month from coating line Coat-3
P₄ = Combined HAP usage in tons per month from coating line Coat-4
R = Combined HAP emissions in tons per month from the eight (8) plastisol curing lines
S = Combined HAP emissions in tons per month from clean-up solvents
Q₁ = Overall HAP control efficiency of Coat-1 oxidizer (from the latest IDEM approved stack test)
Q₂ = Overall HAP control efficiency of Coat-2 oxidizer (from the latest IDEM approved stack test)
Q₃ = Overall HAP control efficiency of Coat-3 oxidizer (from the latest IDEM approved stack test)
Q₄ = Overall HAP control efficiency of Coat-4 oxidizer (from the latest IDEM approved stack test)

State Rule Applicability - Entire Source

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

The source has decided to limit the source-wide VOC emissions to less than 250 tons per year.

VOC emissions from Coat-1, Coat-2, Coat-3, Coat-4, eight (8) plastisol curing lines and cleanup solvents shall be limited to less than 248 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit combined with the potential emissions of other emission units will limit the source-wide VOC PTE to less than 250 tons per 12 consecutive month period and will render 326 IAC 2-2 (PSD) not applicable to the entire source.

Compliance with the VOC emission limit in Condition D.1.2 shall be determined by the following equation:

$$A = ((F_1 * (1 - G_1)) + (F_2 * (1 - G_2)) + (F_3 * (1 - G_3)) + (F_4 * (1 - G_4))) + B + C \quad \text{Where}$$

A = VOC emissions in tons per month
F₁ = VOC usage in tons per month from coating line Coat-1
F₂ = VOC usage in tons per month from coating line Coat-2
F₃ = VOC usage in tons per month from coating line Coat-3

- F₄ = VOC usage in tons per month from coating line Coat-4
- B = VOC emissions in tons per month from the eight (8) plastisol curing lines
- C = VOC emissions in tons per month from clean-up solvents
- G₁ = Overall VOC control efficiency of Coat-1 oxidizer (from the latest IDEM approved stack test)
- G₂ = Overall VOC control efficiency of Coat-2 oxidizer (from the latest IDEM approved stack test)
- G₃ = Overall VOC control efficiency of Coat-3 oxidizer (from the latest IDEM approved stack test)
- G₄ = Overall VOC control efficiency of Coat-4 oxidizer (from the latest IDEM approved stack test)

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

Since the source was constructed prior to July 27, 1997, 326 IAC 2-4.1 does not apply.

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 program. 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 annually by July 1. Therefore, the next emission statement for this source must be submitted by July 1, 2010. 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 Exemptions), 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.

State Rule Applicability – Individual Facilities

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3 (3)(d), Particulate emission limitations for sources of indirect heating), the particulate matter emissions from the two (2) natural gas boilers shall each be limited to 0.8 pounds per mmBtu.

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

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from each plastisol line shall not exceed 3.57 pounds per hour when operating at a process weight rate of 1630 pounds per hour. This emission limitation was calculated using 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:

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

326 IAC 8-2-3 (Can Coating Operations)

- (a) Pursuant to 326 IAC 8-2-3(b)(1) (Can Coating Operations), no owner or operator of a can coating line involved in sheet basecoat (exterior and interior) and overvarnish, may cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 0.34 kilograms per liter of coating (2.8 pounds per gallon) excluding water, after controls, delivered to the coating applicator.

- (b) Pursuant to 326 IAC 8-1-2 (b), the coating lines # 1 through 4 VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

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

Where: L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (2.8 lb/gal);
D = Density of VOC in coating in pounds per gallon of VOC (7.36 lb/gal);
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

$$E = L / (1 - (L/D)) = 2.8 / (1 - (2.8 / 7.36)) = 4.52$$

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than E determined in (b) above.
- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

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

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied (21.92 lb/gal).

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied (4.52 lb/gal).

O = Equivalent overall efficiency of the capture system and control device as a percentage.

$$O = \frac{V - E}{V} \times 100 = (21.92 - 4.52) / 21.9 \times 100 = 79.4$$

The overall efficiency of the thermal oxidizer shall be greater than 79.4%.

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 this source are as follows:

Emission Unit	Control Device	Pollutant	Frequency of Testing	Limit or Requirement
Coat 1 & Coat 2	Catalytic Oxidizers	VOC Control Efficiency	Within 180 days of re-start	> 79.5%
		HAP Control Efficiency		
Coat 3 & Coat 4	Catalytic Oxidizers	VOC Control Efficiency	Every 5 years	> 79.5%
		HAP Control Efficiency		

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

Control	Parameter	Frequency	Excursions and Exceedances
Catalytic Oxidizers Coat 3 - Coat 4	Oxidizer Temperature	Continuous	Response Steps
	Duct Pressure	Daily	Capture Efficiency Testing
Catalytic Oxidizers Coat 1 - Coat 2	Oxidizer Temperature	Continuous (After re-start)	Response Steps
	Duct Pressure	Daily (After re-start)	Capture Efficiency Testing

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 April 14, 2009.

Conclusion

The operation of this fabrication of metals products plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T 177-27766-00001.

**Appendix A: Emission Calculations
VOC & Particulate from Surface Coating operations**

Company Name: Silgan Closures, LLC
Address City IN Zip: 1701 Williamsburg Pike Richmond Indiana 47375
Part 70 Permit: T177-27766-00001

Emissions from Coating operations																	
Coating Line / Coating Material (or) Solvent	Density Lb/Gal	Weight % Volatile (H2O & Organics)	Wt. % Water	Wt. % Organics	Vol.% Water	Vol.% Non-Vol Solids	Gal of Material (gal/ Unit)	Maximum (Units/ Hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water with controls (85%)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate potential (ton/yr)	lb VOC /gal solids	Transfer Efficiency
Line 1 / 22935	8.10	0.68	0.00	0.68	0.00	0.39	0.00	5400.00	5.48	5.48	0.82	88.70	2128.91	388.53	0.00	14.15	1.00
Line 2 / 22935	8.10	0.68	0.00	0.68	0.00	0.39	0.00	5400.00	5.48	5.48	0.82	88.70	2128.91	388.53	0.00	14.15	1.00
Line 3 / 22935	8.10	0.68	0.00	0.68	0.00	0.39	0.00	5400.00	5.48	5.48	0.82	88.70	2128.91	388.53	0.00	14.15	1.00
Line 4 / 22935	8.10	0.68	0.00	0.68	0.00	0.39	0.00	5400.00	5.48	5.48	0.82	88.70	2128.91	388.53	0.00	14.15	1.00
Emissions from Solvent operations																	
Line 1/ P.M. Acetate	7.88	1.00	0.00	1.00	0.00	0.00	0.00	5400.00	7.88	7.88	1.18	1.74	41.87	7.64	0.00	7.88	1.00
Line 2/ P.M. Acetate	7.88	1.00	0.00	1.00	0.00	0.00	0.00	5400.00	7.88	7.88	1.18	2.17	52.08	9.51	0.00	7.88	1.00
Line 3/ P.M. Acetate	7.88	1.00	0.00	1.00	0.00	0.00	0.00	5400.00	7.88	7.88	1.18	2.34	56.17	10.25	0.00	7.88	1.00
Line 4/ P.M. Acetate	7.88	1.00	0.00	1.00	0.00	0.00	0.00	5400.00	7.88	7.88	1.18	2.34	56.17	10.25	0.00	7.88	1.00
Total Potential Emissions												363.41	8721.95	1591.76	0.00		

* NOTE:(1) The 100 % transfer efficiency is because the source uses rollcoat application

(2) These calculations are performed considering the worst case emissions coating materials and solvents used at all the coating lines

METHODOLOGY

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

Checking for compliance

The Pounds VOC per gallon of coating less water with controls is 0.83 for coating 22935 and 1.18 for solvent P.M. Acetate

Therefore, the coating lines # 1 through 4 comply with the requirements of **326 IAC 8-2-9 (Miscellaneous Metal Coating)**.

Potential HAP emissions from Coating Lines

Company Name: Silgan Closures, LLC
Address City IN Zip: 1701 Williamsburg Pike Richmond Indiana 47375
Part 70 Permit: T177-27766-00001

Coating Line / Coating Material	Density	Gallons of Material	Maximum	Wt %	Wt %	Wt %	Wt %	Wt %	Wt %	Xylene Emissions	MIK Emissions	Benzene Emissions	Cumene Emissions	Glycol Ethers Emissions	Isophorone Emissions	Total
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	MIK	ethyl Benzene	Cumene	Glycol Ethers	isophorone	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	
Line 1 / 27964A	7.75	0.003000	6300.00	3.02%	12.59%	0.78%	1.45%	4.06%	10.83%	19.38	80.77	5.00	9.30	26.05	69.48	209.98
Line 2 / 27964A	7.75	0.003000	5100.00	3.02%	12.59%	0.78%	1.45%	4.06%	10.83%	15.68	65.39	4.05	7.53	21.09	56.25	169.99
Line 3 / 27964A	7.75	0.003000	4680	3.02%	12.59%	0.78%	1.45%	4.06%	10.83%	14.39	60.00	3.72	6.91	19.35	51.61	155.99
Line 4 / 27964A	7.75	0.003000	4680	3.02%	12.59%	0.78%	1.45%	4.06%	10.83%	14.39	60.00	3.72	6.91	19.35	51.61	155.99

Total State Potential Emissions **63.85 266.16 16.49 30.65 85.83 228.96 691.94**

*** NOTE:(1) These calculations are performed considering the worst case HAP emissions coating materials used at all the coating lines**

THODOLOGY

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

**Appendix A: Emission Calculations
VOC & Particulate from Plastisol**

Company Name: Silgan Closures, LLC
Address City IN Zip: 1701 Williamsburg Pike Richmond Indiana 47375
Part 70 Permit: T177-27766-00001

ESTIMATED ANNUAL EMISSIONS FROM COMPOUND CURING PRESS LINE - 58 Lug

1/19/04 RLF

58Lug Line

Closure Size	M Caps / Year	Lbs Compound / M Caps	Annual Compound Usage (Lbs)	Annual Lbs VOC Emissions	Annual Lbs TSP Emissions	Annual Production Days	Daily Compound Usage (Lbs)	Daily Lbs VOC Emissions	VOC Emissions (tons/ year)	Daily Lbs TSP Emissions
58 LUG	4,204,800	2.91	12,235,968	9788.8	37,931.5	250	48,944	39.16	7.15	151.73
			0	0.0	-	250	0	-	-	-
			0	0.0	-	250	0	-	-	-
			0	0.0	-	250	0	-	-	-
			0	0.0	-	250	0	-	-	-
	4,204,800		12,235,968	9,789	37,932		48,944	39.16	7.15	151.73

*** Note: M caps indicates 1000 caps**

Lbs VOC/ Lb Compound Cured Emissions Rate (based on Galson Testing at White Cap, LLC - 402)	0.0008
---	---------------

Lbs TSP / Lbs Compound Cured Emission Rate (based on Galson Testing at White Cap, LLC - 402)	0.0031
--	---------------

Max line speed is 1000 caps per minute or 525.6 million per year.
 Average line speed is 750 caps per minute and 182.5 million per year.

Appendix A: Emissions Calculations

Potential Emissions from Natural Gas Combustion MM BTU/HR <100

Company Name: Silgan Closures, LLC
Address City IN Zip: 1701 Williamsburg Pike Richmond Indiana 47375
Part 70 Permit: T177-27766-00001

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

31.5

275.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.3	1.0	0.1	13.8	0.8	11.6

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

**Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions**

Company Name: Silgan Closures, LLC
Address City IN Zip: 1701 Williamsburg Pike Richmond Indiana 47375
Part 70 Permit: T177-27766-00001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.897E-04	1.656E-04	1.035E-02	2.483E-01	4.691E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.899E-05	1.518E-04	1.932E-04	5.243E-05	2.897E-04

Methodology is the same as page 1.

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

Appendix A: Emission Calculations

Potential Emissions from Entire source (Coating lines+ Plastisol+ Nat. Gas Combustion)

Company Name: Silgan Closures, LLC
Address City IN Zip: 1701 Williamsburg Pike Richmond Indiana 47375
Part 70 Permit: T177-27766-00001

Uncontrolled PTE

Emission Unit	PM	PM-10	SO2	NOx	VOC	CO	Single	HAPS
	(tons / yr)	HAP	(tons / yr)					
Coating Lines (including cleanup)	0	0	0	0	1591.76	0	228.9 (Isophorone)	691.94
Plastisol	3.46	3.46	0	0	0.9	0	0	0
Nat. Gas Boiler	0.3	1	0.1	13.8	0.8	11.6	negligible	0.26
Total	3.76	4.46	0.1	13.8	1593.455	11.6		692.2

Limited PTE

Emission Unit	PM	PM-10	SO2	NOx	VOC	CO	Single	HAPS
	(tons / yr)	HAP	(tons / yr)					
Coating Lines (including cleanup) and Plastisol	3.46	3.46	0	0	248	0	9.9	24.7
Nat. Gas Boiler	0.3	1	0.1	13.8	0.8	11.6	negligible	0.26
Total	3.76	4.46	0.1	13.8	248.8	11.6	9.9	24.96



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: Sharon Ernest
Silgan White Cap Corporation
2501 Frontier Rd
Oconomowoc, WI 53066

DATE: December 17, 2009

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

SUBJECT: Final Decision
Title V - Renewal
177-27766-00001

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:
James Stajkowski (Plant Manager)
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

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December 17, 2009

TO: Morrison Reeves Public Library

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

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

Applicant Name: Silgan White Cap Corporation
Permit Number: 177-27766-00001

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 12/17/2009 Silgan White Cap Corporation 177-27766-00001 (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		Sharon Ernest Silgan White Cap Corporation 2501 Frontier Rd Oconomowoc WI 53066 (Source CAATS) via confirmed delivery										
2		James Stajkowski Plant Mgr Silgan White Cap Corporation 1701 Williamsburg Pike Richmond IN 47375 (RO CAATS)										
3		Mr. Patrick Adkins 2894 S 950 E Hagerstown IN 47346 (Affected Party)										
4		Morrisson Reeves Public Library 80 N 6th St Richmond IN 47374-3079 (Library)										
5		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)										
6		Richmond City Council and Mayors Office 50 North 5th Street Richmond IN 47374 (Local Official)										
7		Wayne County Commissioners 401 East Main Street Richmond IN 47374 (Local Official)										
8		Mr. Randall Shrock 2764 Abington Pike Richmond IN 47374 (Affected Party)										
9		Wayne County Health Department 401 E. Main Street Richmond IN 47374-4388 (Health Department)										
10												
11												
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