



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: August 18, 2010

RE: Crown Cork & Seal Company, Inc / 107-29196-00004

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

## Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

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

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

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



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## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

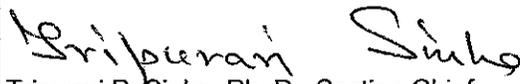
**Crown Cork & Seal, Inc.**  
**400 N. Walnut Street**  
**Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to construct and 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 107-27624-00004	
Issued by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 9, 2009  Expiration Date: October 9, 2014

Significant Permit Modification No.: T 107-29196-00004	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 18, 2010  Expiration Date: October 9, 2014

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary punch press, printing, and sheet coating operation.

Source Address:	400 N. Walnut Street, Crawfordsville, IN 47933
General Source Phone Number:	(765) 362-3200
SIC Code:	3468
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source under PSD and Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) UV press line equipped with one (1) sheet coater booth, identified as Line 2, constructed in 1996, decorating and coating metal sheets, maximum line speed is 4,500 sheets/hour, application method is roll coating, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1.
- (b) Two (2) heatset offset litho press lines each equipped with a sheet coater booth identified as Line 3 and Line 4, constructed in 1988, decorating and coating metal sheets, each having a maximum line speed of 4,500 sheets/hour, application method is roll coating, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1.
- (c) Two (2) sheet coater booths, identified as Line 5 and Line 6, constructed in 1988, each coating metal sheets, each having maximum sheets per hour is 6,000, application method used is roll coating, each using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booths (Lines 5 and 6) is utilized.
- (d) One (1) sheet coater booth, identified as Line 7, approved for construction in 2010, coating metal sheets, with maximum capacity of 6,000 sheets per hour, application method used is roll coating, equipped with a drying oven, using a thermal oxidizer, TO2, to control emissions, exhausting to stack I-2. A permanent total enclosure for the sheet coater booth (Lines 7) is utilized.
- (e) One (1) thermal oxidizer, identified as TO2, approved for construction in 2010, equipped with a 3.8 MMBtu/hr natural gas-fired burner, with heat being recirculated to the drying oven after burn-off.

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

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

The following equipment related to manufacturing activities not resulting in the emission of HAP:  
Brazeing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]

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

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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]

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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)]

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- (a) This permit, T 107-27624-00004, 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]

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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]

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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)]

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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)]

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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)]

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- (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. 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)]

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
- (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent 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)]**

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- (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 that meets the requirements of 326 IAC 2-7-6(1) by a "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]

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

#### 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 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.

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]**

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- (a) All terms and conditions of permits established prior to T 107-27624-00004 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)]**

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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 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]**

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- (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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]**

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- (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 by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 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 does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.18 Permit Revision Under Economic Incentives and Other Programs**  
**[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

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- (a) No Part 70 permit revision or notice 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.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (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 a certification by a "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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

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- (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]**

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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 5-1-1 (Applicability) and 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 that meets the requirements of 326 IAC 2-7-6(1) by a "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) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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]**

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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)]**

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

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

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

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

**C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

**C.14 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.15 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]**

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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

**C.16 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- 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) 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**

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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:

## SECTION D.0 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The entire source, consisting of the following:

- (a) One (1) UV press line equipped with one (1) sheet coater booth, identified as Line 2, constructed in 1996, decorating and coating metal sheets, maximum line speed is 4,500 sheets/hour, application method is roll coating, using regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1.
- (b) Two (2) heatset offset litho press lines each equipped with a sheet coater booth, identified as Lines 3 and 4, constructed in 1988, decorating and coating metal sheets, each having a maximum line speed of 4,500 sheets/hour, application method is roll coating, using regenerative thermal oxidizer, RTO1, as control, exhausting to stack I-1.
- (c) Two (2) sheet coater booths, identified as Lines 5 and 6, constructed in 1988, each coating metal sheets, each having maximum sheets per hour is 6,000, application method used is rollcoating, each using regenerative thermal oxidizer, RTO1, as control, exhausting to stack I-1. A permanent total enclosure for the sheet coater booths (Lines 5 and 6) will be utilized.
- (d) One (1) sheet coater booth, identified as Line 7, approved for construction in 2010, coating metal sheets, with maximum capacity of 6,000 sheets per hour, application method used is roll coating, equipped with a drying oven, using a thermal oxidizer, TO2, to control emissions, exhausting to stack I-2. A permanent total enclosure for the sheet coater booth (Lines 7) is utilized.

(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.0.1 PSD Minor Limit [326 IAC 2-2]

VOC emissions from Line 2, Line 3, Line 4, Line 5, Line 6, and Line 7 and cleanup solvents shall be limited to less than 245 tons per twelve consecutive month period with compliance determined at the end of every month.

Compliance with this limit together with PTE from other emissions units shall limit the source-wide VOC emissions to less than 250 tons per 12 consecutive month period and will render 326 IAC 2-2 (PSD) not applicable to this modification.

#### D.0.2 Hazardous Air Pollutants (HAPs) Minor Limits [326 IAC 2-4.1 and 40 CFR 63]

The Permittee shall comply with the following:

- (a) The single HAP input to the Press Lines (Lines 2, 3 and 4), the Sheet Coater Lines (Lines 5, 6, and 7) and cleanup solvents shall be less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total HAPs input to the Press Lines (Lines 2, 3 and 4), the Sheet Coater Lines (Lines 5, 6, and 7) and cleanup solvents shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Compliance with these limits and potential HAPs emissions from all other emission units shall limit the source wide single HAP and total HAPs emissions to less than 10 and 25 tons per year, respectively and make the source an area source for HAPs and also render 2-4.1 not applicable to Line 7.

### D.0.3 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

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Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.0.1 and D.0.2, the Permittee shall operate RTO1 and TO2 at all times that an associated sheet coater booths is in operation.

### D.0.4 VOC Usage Limit Determination

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Compliance with the VOC emission limit in Condition D.0.1 shall be determined by the following equation:

$$N = (M_3 * (1 - (C_3 * D_{RTO1}))) + (M_5 * (1 - (C_5 * D_{RTO1}))) + (M_7 * (1 - (C_7 * D_{TO2}))) + R$$

Where,

- N = VOC emissions in tons per month
- M<sub>3</sub> = VOC usage in tons per month from Lines 2,3&4
- M<sub>5</sub> = VOC usage in tons per month from Lines 5&6
- M<sub>7</sub> = VOC usage in tons per month from Line 7
- C<sub>3</sub> = Capture Efficiency of for lines 2,3 & 4 (as determined by the latest IDEM approved stack test)
- C<sub>5</sub> = Capture Efficiency of the total enclosure for lines 5 & 6 (100%)
- C<sub>7</sub> = Capture Efficiency of the total enclosure for Line 7 (100%)
- D<sub>RTO1</sub> = Destruction Efficiency of RTO1 (as determined by the latest IDEM approved stack test)
- D<sub>TO2</sub> = Destruction Efficiency of TO2 (as determined by the latest IDEM approved stack test)
- R = VOC usage of solvents per month in tons
- L = VOC usage from any coatings that did not pass through a thermal oxidizer

### D.0.5 HAP Usage Limit Determinations

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Compliance with the HAP emission limit in Condition D.0.2 shall be determined by the following equations:

#### Equation 1: Single HAP Input Limit

$$D = (N_3 * (1 - (C_3 * D_{RTO1}))) + (N_5 * (1 - (C_5 * D_{RTO1}))) + (N_7 * (1 - (C_7 * D_{TO2}))) + T$$

Where

- D = Single worst case HAP emissions in a month
- N<sub>3</sub> = Single worst case HAP usage in tons per month from Lines 2,3&4
- N<sub>5</sub> = Single worst case HAP usage in tons per month from Lines 5&6
- N<sub>7</sub> = Single worst case HAP usage in tons per month from Line 7
- C<sub>3</sub> = Capture Efficiency of for lines 2,3 & 4 (as determined by the latest IDEM approved stack test)
- C<sub>5</sub> = Capture Efficiency of the PTE for lines 5 & 6 (100%)
- C<sub>7</sub> = Capture Efficiency of the PTE for Line 7 (100%)
- D<sub>RTO1</sub> = Destruction Efficiency of RTO1 (as determined by the latest IDEM approved stack test)
- D<sub>TO2</sub> = Destruction Efficiency of TO2 (as determined by the latest IDEM approved stack test)
- T = Single worst case HAP usage of solvents per month in tons
- L = Single worst case HAP usage from any coatings that did not pass through a thermal oxidizer

#### Equation 2: Total Combined HAP Input Limit

$$J = (P_3 * (1 - (C_3 * D_{RTO1}))) + (P_5 * (1 - (C_5 * D_{RTO1}))) + (P_7 * (1 - (C_7 * D_{TO2}))) + T$$

Where

- J = Combined HAP emissions in tons month

- P<sub>3</sub> = Total HAP usage in tons per month from Lines 2,3&4  
P<sub>5</sub> = Total HAP usage in tons per month from Lines 5&6  
P<sub>7</sub> = Total HAP usage in tons per month from Line 7  
C<sub>3</sub> = Capture Efficiency of for lines 2,3 & 4 (as determined by the latest IDEM approved stack test)  
C<sub>5</sub> = Capture Efficiency of the PTE for lines 5 & 6 (100%)  
C<sub>7</sub> = Capture Efficiency of the PTE for Line 7 (100%)  
D<sub>RTO1</sub> = Destruction Efficiency of RTO1 (as determined by the latest IDEM approved stack test)  
D<sub>TO2</sub> = Destruction Efficiency of TO2 (as determined by the latest IDEM approved stack test)  
T = Total HAP usage of solvents per month in tons  
L = Total HAP usage from any coatings that did not pass through a thermal oxidizer

**D.0.6 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]**

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- (a) In order to determine compliance with Conditions D.0.1 and D.0.3, the Permittee shall perform overall VOC and HAPs control efficiency testing of TO2, temperature and pressure drop not later than one hundred eighty (180) days after operation of TO2 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Section C-Performance Testing contains the Permittee's obligations with regard to the testing requirements required by this condition.
- (b) In order to determine compliance with Conditions D.0.1 and D.0.3, the Permittee shall perform overall VOC and HAPs control efficiency testing of RTO1 temperature and duct pressure before utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Section C-Performance Testing contains the Permittee's obligations with regard to the testing requirements required by this condition.

**D.0.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC and HAP content and usage limitations contained in Conditions D.0.1 and D.0.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)] [40 CFR 64]**

**D.0.8 Thermal Oxidizer Temperature [40 CFR 64]**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on RTO1 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 average. The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature determined from the most recent stack test.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated on TO2 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 average. The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature at 1328°F - 1400°F (manufacturer's specified range) or at a temperature determined from the most recent stack test.
- (c) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.1, D.2.3, D.3.1, D.3.3, D.4.1, and D.4.2.

#### D.0.9 Parametric Monitoring [40 CFR 64]

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- (a) The duct pressure for RTO1 shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.
- (b) The duct pressure for TO2 shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

#### D.0.10 Record Keeping Requirements

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- (a) To document compliance with Condition D.0.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.0.1.
  - (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, for each coating line;
    - (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) When using noncompliant coatings, the volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month; and
  - (5) The total VOC usage for each month.
- (b) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizers and the hourly average temperatures used to demonstrate compliance during the most recent compliant stack test.
- (c) Daily records of the duct pressure readings or the reason the duct pressures reading was not taken that day (i.e. the process did not operate).
- (d) To document compliance with the single and combined HAP limits in Condition D.0.2, 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 emissions limits established for this source.
  - (1) The amount and HAP content of each coating material and solvent used, for each coating line. 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; and
  - (3) The single and combined HAP usage for each month.
- (e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.0.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.0.1 and D.0.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

One (1) UV press line equipped with one (1) sheet coater booth, identified as Line 2, constructed in 1996, decorating and coating metal sheets, maximum line speed is 4,500 sheets/hour, application method is roll coating, controlled by a voluntary regenerative thermal oxidizer, RTO1, exhausting to stack I-1.

(The information describing the process contained in this emissions unit 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 Limitations (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Clear Coat	4.3
Extreme Performance Coat	3.5
All Other Coat	3.0

- (b) If more than one (1) emission limitation in section D.1.1(a) applies to a specific coating then the least stringent emission limitation shall be applied.

#### D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-Up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-3]

Pursuant to 326 IAC 8-2-3 (Can Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal sheets for the purpose of fabricating of metal cans shall be limited to 2.8 pounds of VOC per gallon of coating less water, delivered to the coating applicator from two-piece can exterior operations.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, is required for the press line and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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

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

### **D.1.6 Record Keeping Requirement**

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- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in Conditions D.1.1 and D.1.3.
- (1) The VOC content of each coating material and solvent used less water;
  - (2) The amount of coating material and solvent used on monthly basis;
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month; and
  - (5) The total VOC usage for each month.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

Two (2) heatset offset litho press lines each equipped with a sheet coater booth, identified as Lines 3 and 4, constructed in 1988, decorating and coating metal sheets, each having a maximum line speed of 4,500 sheets/hour, application method is roll coating, using regenerative thermal oxidizer, RTO1, as control, exhausting to stack I-1.

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

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

#### D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of (4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings) pounds of VOC per gallon of coating excluding water, delivered to roll coating.
- (b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions of the two (2) heatset offset litho press lines 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 (4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings);

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.

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 (10.34 when using clear coating, 6.67 when using extreme performance coating, or 5.06 for all other coatings).
- (d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = (V - E) / V \times 100$$

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 (10.52 lb/gal).

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

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

- (e) The overall efficiency of the thermal oxidizer shall be greater than 2%, when using clear coating, 37% when using extreme performance coating, or 52% when using all other coatings.

#### D.2.2 Volatile Organic Compound (VOC) Limitations, Clean-Up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.2.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-3] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-3 (Can Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal sheets for the purpose of fabricating of metal cans shall be limited to 2.8 pounds of VOC per gallon of coating less water, delivered to the coating applicator from two-piece can exterior operations.
- (b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions of the two (2) heatset offset litho press lines 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.

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 4.52.
- (d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = (V - E) / V \times 100$$

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 (10.52 lb/gal).

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

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

(e) The overall efficiency of the thermal oxidizer shall be greater than 57%.

**D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan is required for this facility and its control device two press lines and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

**D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

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Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.2.1 and D.2.3, the Permittee shall operate the thermal oxidizer at all times that the sheet coater booths are in operation.

**D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

---

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.2.7 Record Keeping Requirement**

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(a) To document compliance with Conditions D.2.1 and D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in Conditions D.2.1 and D.2.3.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month; and

(5) The total VOC usage for each month.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) sheet coater booths, identified as Lines 5 and 6, constructed in 1988, each coating metal sheets, each having maximum sheets per hour is 6,000, application method used is rollcoating, each using regenerative thermal oxidizer, RTO1 as control, exhausting to stack I-1. A permanent total enclosure for the sheet coater booths (Lines 5 and 6) will be utilized before November 13, 2006.
- (b) One (1) sheet coater booth, identified as Line 7, approved for construction in 2010, coating metal sheets, with maximum capacity of 6,000 sheets per hour, application method used is roll coating, equipped with a drying oven, using a thermal oxidizer, TO2 to control emissions, exhausting to stack I-2. A permanent total enclosure for the sheet coater booth (Lines 7) is utilized.

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

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

#### D.3.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of (4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings) pounds of VOC per gallon of coating excluding water, delivered to roll coating.
- (b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions of the three (3) sheet coater booths 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 (4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings);

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.

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 (10.34 when using clear coating, 6.67 when using extreme performance coating, or 5.06 for all other coatings).
- (d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of each thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = (V - E) / V \times 100$$

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 (26.53 lb/gal).

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

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

- (e) The overall efficiency of each thermal oxidizer shall be greater than 61%, when using clear coating, 75% when using extreme performance coating, or 81% when using all other coatings.

#### D.3.2 Volatile Organic Compound (VOC) Limitations, Clean-Up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.3.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-3] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-3 (Can Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal sheets for the purpose of fabricating of metal cans shall be limited to 2.8 pounds of VOC per gallon of coating less water, delivered to the coating applicator from two-piece can exterior operations.
- (b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions of the two (2) heatset offset litho press lines 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.

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 4.52.
- (d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = (V - E) / V \times 100$$

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 (26.53 lb/gal).

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

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

- (e) The overall efficiency of the thermal oxidizer shall be greater than 83%.

#### D.3.4 VOC and HAP Limitations [326 IAC 8-1-2]

---

The VOC and HAP capture systems shall meet the following criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC and HAP emissions are captured and contained for discharge through a control device:

- (a) Any natural draft opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.
- (b) The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.
- (c) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters per hour (200 feet per minute). The direction of air through all NDOs shall be into the enclosure.
- (d) All access doors and windows whose areas are not included in Condition (b) and are not included in the calculation in Condition (c), shall be closed during routine operation of the process.
- (e) All VOC emissions must be captured and contained for discharge through a control device.

#### D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan is required for the sheet coater booths and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

---

Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.3.1, the Permittee shall operate RTO1 and TO2 at all times that the associated coating booths are in operation.

#### D.3.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

---

Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

### **D.3.8 Record Keeping Requirement**

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- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in Condition D.3.1.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month; and
  - (5) The total VOC usage for each month.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

The following equipment related to manufacturing activities not resulting in the emission of HAP:  
Brazeing equipment, cutting torches, soldering equipment, and welding equipment.

(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.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

---

Pursuant to 326 IAC 6-3-2, (Particulate Matter Emission Limitations), the PM from the insignificant welding, brazing, soldering, and torch cutting shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

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

Source Name: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004

**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: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004

**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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004  
Facility: Line 2, Line 3, Line 3, Line 5, Line 5, Line 6, and Line 7 and cleanup solvents  
Parameter: VOC  
Limit: Less than 245 tons per consecutive twelve (12) month period, with compliance determined at the end of each month as determined by the equation in D.0.4.

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: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004  
Facility: Line 2, Line 3, Line 3, Line 5, Line 5, Line 6, and Line 7 and cleanup solvents  
Parameter: Single worst case HAP emissions  
Limit: Single worst case HAP emissions are limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month as determined by the equation in D.0.5.

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: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004  
Facility: Line 2, Line 3, Line 3, Line 5, Line 5, Line 6, and Line 7 and cleanup solvents  
Parameter: Total HAP emissions  
Limit: Total HAP emissions are limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month as determined by the equation in D.0.5.

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: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004

**Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_**

Page 1 of 2

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Addendum to the Technical Support Document (ATSD) for a Significant  
Permit and Significant Source Modification**

**Source Background and Description**

Source Name:	Crown Cork and Seal Company, Inc.
Source Location:	400 N Walnut St., Crawfordsville, IN 47933
County:	Montgomery
SIC Code:	3466, 3468
Operation Permit No.:	T107-27624-00004
Operation Permit Issuance Date:	October 2, 2009
Significant Source Modification No.:	107-29194-00004
Significant Permit Modification No.:	107-29196-00004
Permit Reviewer:	Jillian Bertram

On June 24, 2010, the Office of Air Quality (OAQ) had a notice published in Journal Review in Crawfordsville, Indiana, stating that Crown Cork and Seal Company, Inc. had applied for a significant permit and significant source modification to add an additional paint line and the associated thermal oxidizer. The notice also stated that the OAQ proposed to issue a significant permit and significant source modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

On June 28, 2010, Crown Cork and Seal Company, Inc. submitted comments to IDEM, OAQ on the draft significant permit and significant source modification.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

**Comment 1:**

Condition D.0.8 of the permit requires that the thermal oxidizer, TO2, operate at 1400F or higher until an appropriate temperature is determined by a stack test. However, the manufacturer specifies that the optimal thermal oxidizer temperature is 1328-1400<sup>0</sup> F. The source has experienced damage to similar equipment at other facilities and is requesting to operate under the manufacturer's specifications until a stack test is performed.

**Response to Comment 1:**

IDEM agrees with the recommended changes, since the source provided specifications from the manufacturer supporting these claims. The permit has been revised as follows.

**D.0.8 Thermal Oxidizer Temperature [40 CFR 64]**

\*\*\*

- (b) A continuous monitoring system shall be installed,calibrated, maintained, and operated on TO2 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 average. The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature at **1328-1400<sup>0</sup> F (manufacturer's specified range)** at 1400F or at a temperature determined from the most recent stack test.

#### Additional Changes

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

- (a) IDEM has also removed the appropriate duct pressure determination from Condition D.0.9 because it duplicates requirements in Condition D.0.6.

#### D.0.9 Parametric Monitoring [40 CFR 64]

- ~~(a) The Permittee shall determine the appropriate duct pressure for each thermal oxidizer from the most recent valid stack test that demonstrates compliance with limits in Conditions D.0.1 and D.0.2 as approved by IDEM.~~
- (a) The duct pressure **for RTO1** shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.
- (b) The duct pressure for TO2 shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.**

#### IDEM Contact

- (a) Questions regarding this proposed significant permit and significant source modification can be directed to [jbertram@idem.in.gov](mailto:jbertram@idem.in.gov) at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317)233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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

**Technical Support Document (TSD) for a Part 70 Significant Permit and  
Significant Source Modifications**

**Source Description and Location**

Source Name:	Crown Cork and Seal Company, Inc.
Source Location:	400 N Walnut St., Crawfordsville, IN 47933
County:	Montgomery
SIC Code:	3466, 3468
Operation Permit No.:	T107-27624-00004
Operation Permit Issuance Date:	October 2, 2009
Significant Source Modification No.:	107-29194-00004
Significant Permit Modification No.:	107-29196-00004
Permit Reviewer:	Jillian Bertram

**Existing Approvals**

The source was issued Part 70 Operating Permit No. 107-27624-00004 on October 2, 2009. The source not had any approvals since.

**County Attainment Status**

The source is located in Montgomery County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Montgomery 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<sub>2.5</sub>

Montgomery County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

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

**Fugitive Emissions**

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

**Source Status**

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

Pollutant	Emissions (ton/yr)
PM	0.00
PM <sub>10</sub>	0.00
PM <sub>2.5</sub>	0.00
SO <sub>2</sub>	0.00
VOC	<250
CO	0.00
NO <sub>x</sub>	0.00
Single HAPs	<10.00
Total	<25.00

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) These emissions are based upon 107-27624-00004.

This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Crown Cork and Seal Company, Inc. on April 26, 2010, relating to the addition of one paint line and the associated oven and RTO. Also, existing units were left out of the previous approval and have been included. The following is a list of modified and previously unaccounted for emission units and pollution control devices.

#### New Emission Units:

- (a) One (1) sheet coater booth, identified as Line 7, approved for construction in 2010, coating metal sheets, with maximum capacity of 6,000 sheets per hour, application method used is roll coating, equipped with a drying oven, using a regenerative thermal oxidizer to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth (Lines 7) is utilized.
- (b) One (1) regenerative thermal oxidizer, identified as RTO2, approved for construction in 2010, equipped with a 3.8 MMBtu/hr natural gas-fired burner, with heat being recirculated to the drying oven after burn-off.

#### Previously Unaccounted for Units (Insignificant):

- (a) One (1) regenerative thermal oxidizer, identified as RTO1, equipped with two natural gas-fired burners with a maximum heat input capacity of 4 MMBtu/hr, each, controlling emissions from Lines 2 through 6.
- (b) Drying ovens, natural gas-fired with heat input equal to or less than ten million (10,000,000) british thermal units per hour, associated with Lines 2 through 6.

### Enforcement Issues

There are no pending enforcement actions related to this modification.

### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

### Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<b>PTE Before Controls of the Modification</b>	
<b>Pollutant</b>	<b>Potential To Emit (ton/yr)</b>
PM	0.18
PM <sub>10</sub>	0.72
SO <sub>2</sub>	0.06
VOC	422.11
CO	8.00
NO <sub>x</sub>	9.53
Single HAPs	>10
Total HAPs	>25

This source modification is subject to 326 IAC 2-7-10.5(f)(4) because the potential to emit VOC from the modification is greater than 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because the modification requires a change in a case-by-case determination of an emission limitation or standard.

<b>PTE of the Entire Source After Issuance of the Significant Source and Permit Modificaiton</b>
--

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Modification (tons/year)							
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Line 2	0.00	0.00	0.00	0.00	245.0 **	0.00	24.0	<10
Line 3	0.00	0.00	0.00	0.00		0.00		
Line 4	0.00	0.00	0.00	0.00		0.00		
Line 5	0.00	0.00	0.00	0.00		0.00		
Line 6	0.00	0.00	0.00	0.00		0.00		
Line 7	0.00	0.00	0.00	0.00		0.00		
RTO2	0.03	0.12	0.01	1.64	0.09	1.38	0.03	0.03
Insignificant Ovens	0.08	0.33	0.03	4.38	0.24	3.68	0.08	0.08
RTO1	0.07	0.27	0.02	3.50	0.19	2.94	0.07	0.06
Total PTE of Entire Source	0.18	0.72	0.06	9.53	246.5	8.00	24.18	<10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** The source requested that Line 7 be included in the existing VOC and HAPs limits, the source also requested that the VOC limit be lowered to 245 tons per year, and the total HAP limit be lowered to 24.0 tons per year to accommodate for VOC and total HAP emissions from unforeseen insignificant activities.								

(a) PSD Minor Source

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

VOC emissions from Line 2, Line 3, Line 4, Line 5, Line 6, and Line 7 and cleanup solvents shall be limited to less than 245 tons per twelve consecutive month period with compliance determined at the end of every month.

Compliance with this limit will limit the source-wide VOC emissions to less than 250 tons per 12 consecutive month period, which renders 326 IAC 2-2 (PSD) not applicable.

(b) HAP Minor Source

This modification to an existing area source for HAPs will not change the area source status, because the potential to emit of single HAPs and total HAPs from the entire source will continue to be less than the 10 tons per year and 25 tons per year, respectively. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

In order to render the requirements of 326 IAC 2-4.1 not applicable, the source shall comply with the following:

- (a) The single HAP input to the Press Lines (Lines 2, 3 and 4), the Sheet Coater Lines (Lines 5, 6, and 7) and cleanup solvents shall be less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total HAPs input to the Press Lines (Lines 2, 3 and 4), the Sheet Coater Lines (Lines 5, 6, and 7) and cleanup solvents shall be limited to less than 24 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Compliance with these limits and potential HAPs emissions from all other emission units shall limit the source wide single HAP and total HAPs emissions to less than 10 and 25 tons per year, respectively.

### Federal Rule Applicability Determination

The following federal rules are applicable to the modification:

#### **NSPS:**

- (a) Line 7 is not subject to the requirements of the New Source Performance Standard for Beverage Can Surface Coating, 40 CFR 60.60.49, Subpart WW, because this facility does not coat beverage cans.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

#### **NESHAP:**

- (c) Line 7 is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating at Area Sources, Subpart HHHHHH because none of the coating contain target HAPs listed in 40 CFR 63.11169(c).
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified 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 Part 70 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 new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Line 7	TO2	Y - 326 IAC 8-2-9	422.11	28.49	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Line 7 for VOC upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application.

<b>State Rule Applicability Determination</b>
---

The following state rules are applicable to the source to the modification:

**326 IAC 2-2 and 2-3 (PSD and Emission Offset)**

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

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

Source-wide emissions are limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2005, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

**326 IAC 8-2-9 (Miscellaneous Metal Coating)**

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at Line 7 shall be limited to 4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings pounds of VOC per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (a) Pursuant to 326 IAC 8-1-2 (b), Line 7 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;
- D= Density of VOC in coating in pounds per gallon of VOC;
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

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).

- (b) The pounds of VOC per gallon of coating solids shall be limited to less than (10.34 when using clear coating, 6.67 when using extreme performance coating, or 5.06 for all other coatings).
- (c) 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.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

**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 and Monitoring Requirements applicable to this modification are as follows:

Emission Unit/Control	Operating Parameters	Frequency
RTO 2	Temperature	Continuous
RTO2	Fan Amperage	Once per day

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing
Line 7	RTO2	180 days of start-up	VOC, HAP	5 years

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 107-27624-00004. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

#### Changes due to this modification:

##### Change No. 1

Process description information for the new line and associated RTO and previously unaccounted for units has been added to A and D conditions.

##### 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:

\*\*\*

- (d) **One (1) sheet coater booth, identified as Line 7, approved for construction in 2010, coating metal sheets, with maximum capacity of 6,000 sheets per hour, application method used is roll coating, equipped with a drying oven, using a regenerative thermal oxidizer to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth (Lines 7) is utilized.**
- (e) **One (1) regenerative thermal oxidizer, identified as RTO2, approved for construction in 2010, equipped with a 3.8 MMBtu/hr natural gas-fired burner, with heat being recirculated to the drying oven after burn-off.**
- (f) **One (1) regenerative thermal oxidizer, identified as RTO1, equipped with two natural gas-fired burners with a maximum heat input capacity of 4 MMBtu/hr, each, controlling emissions from Lines 2 through 6.**
- (g) **Drying ovens, natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour, associated with Lines 2 through 6.**

\*\*\*

#### SECTION D.0 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The entire source, consisting of the following:

\*\*\*

- (d) **One (1) sheet coater booth, identified as Line 7, approved for construction in 2010, coating metal sheets, with maximum capacity of 6,000 sheets per hour, application method used is roll coating, equipped with a drying oven, using a regenerative thermal oxidizer to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth (Lines 7) is utilized.**

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

\*\*\*

#### SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) sheet coater booths, identified as Lines 5 and 6, constructed in 1988, each coating metal sheets, each having maximum sheets per hour is 6,000, application method used is rollcoating, each using regenerative thermal oxidizer as control, exhausting to stack I-1. A permanent total enclosure for the sheet coater booths (Lines 5 and 6) will be utilized before November 13, 2006.
- (b) **One (1) sheet coater booth, identified as Line 7, approved for construction in 2010, coating metal sheets, with maximum capacity of 6,000 sheets per hour, application method used is roll coating, equipped with a drying oven, using a regenerative thermal oxidizer to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth (Lines 7) is utilized.**

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

### Change No. 2

Line 7 has been added to the PSD minor limit for the other lines. This limit has also been adjusted to account for other emission sources of VOC. Line 7 has also been added to the compliance determination equation.

#### D.0.1 PSD Minor Limit [326 IAC 2-2]

VOC emissions from Line 2, Line 3, Line 4, Line 5, ~~and~~ Line 6, **and Line 7** and cleanup solvents shall be limited to less than ~~250~~ **245** tons per twelve consecutive month period with compliance determined at the end of every month.

Compliance with this limit will limit the source-wide VOC ~~PTE~~ **emissions** to less than 250 tons per 12 consecutive month period, which renders 326 IAC 2-2 (PSD) not applicable.

\*\*\*

#### D.0.4 VOC Usage Limit Determination

Compliance with the VOC emission limit in Condition D.0.1 shall be determined by the following equation:

$$N = ((M * (1 - P_1)) + (Q * (1 - P_1))) + R + (S * (1 - P_2)) \quad \text{Where}$$

N = VOC emissions in tons per twelve (12) consecutive month period

M = VOC usage in tons per twelve (12) consecutive month period from Sheet Coater Lines (Lines 5 and 6)

Q = VOC usage in tons per twelve (12) consecutive month period from Press Lines (Lines 2, 3, and 4)

R = VOC emissions in tons per twelve (12) consecutive month period from clean-up solvents

P<sub>1</sub> = Overall control efficiency of ~~the~~ RTO 1 (from the latest IDEM approved stack test)

**S = VOC usage in tons per twelve (12) consecutive month period from Line 7**

**P<sub>2</sub> = Overall control efficiency of RTO2 (from the latest IDEM approved stack test)**

\*\*\*

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

### Part 70 Quarterly Report

Source Name: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933

Part 70 Permit No.: T 107-27624-00004  
Facility: ~~Source-wide~~ **Line 2, Line 3, Line 4, Line 5, Line 6, and Line 7**  
Parameter: VOC  
Limit: Less than ~~250~~ **245** tons per consecutive twelve (12) month period, with compliance determined at the end of each month.

### Change No. 3

Line 7 has been added to the HAP limitations for the other lines. Line 7 has also been added to the compliance equations.

#### D.0.2 Hazardous Air Pollutants (HAPs) Emissions

---

The Permittee shall comply with the following:

- (a) The single HAP input to the Press Lines (Lines 2, 3 and 4), the Sheet Coater Lines (Lines 5, ~~and 6, and 7~~ **and 7**) and cleanup solvents shall be less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total HAPs input to the Press Lines (Lines 2, 3 and 4), the Sheet Coater Lines (Lines 5, ~~and 6, and 7~~ **and 7**) and cleanup solvents shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Compliance with these limits and potential HAPs emissions from all other emission units shall limit the source wide single HAP and total HAPs emissions to less than 10 and 25 tons per year, respectively.

\*\*\*

#### D.0.5 HAP Usage Limit Determinations

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Compliance with the HAP emission limit in Condition D.0.2 shall be determined by the following equations:

##### Equation 1: Single HAP Input Limit

$$D = ((E * (1 - C_1)) + (F * (1 - C_1))) + G + (H * (1 - C_2))$$

Where

D = Single worst case HAP emissions in tons per twelve (12) consecutive month period

E = Single HAP usage in tons per twelve (12) consecutive month period from Sheet Coater Lines (Lines 5 and 6)

F = Single HAP usage in tons per twelve (12) consecutive month period from Press Lines (Lines 2, 3, and 4)

G = Single worst case HAP emissions in tons per twelve (12) consecutive month period from clean-up solvents

C<sub>1</sub> = Overall control efficiency of the RTO1 (from the latest IDEM approved stack test)

**H = Single worst case HAP emissions in tons per twelve (12) consecutive month period from Line 7**

**C<sub>2</sub> = Overall control efficiency of RTO2 (from the latest IDEM approved stack test)**

##### Equation 2: Total Combined HAP Input Limit

$$J = ((K * (1 - C_1)) + (L * (1 - C_1))) + M + (B * (1 - C_2))$$

Where

J = Combined HAP emissions in tons per twelve (12) consecutive month period

K = Combined HAP usage in tons per twelve (12) consecutive month period from Sheet Coater Lines (Lines 5 and 6)

L = Combined HAP usage in tons per twelve (12) consecutive month period from Press Lines (Lines 2, 3, and 4)

M = Combined HAP emissions in tons per twelve (12) consecutive month period from clean-up solvents

C<sub>1</sub> = Overall control efficiency of the RTO1 (from the latest IDEM approved stack test)

**B = Combined HAP usage in tons per twelve (12) consecutive month period from Line 7**

**C<sub>2</sub> = Overall control efficiency of RTO2 (from the latest IDEM approved stack test)**  
\*\*\*

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

**Part 70 Quarterly Report**

Source Name: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004  
Facility: ~~Source-wide~~ **Line 2, Line 3, Line 4, Line 5, Line 6, and Line 7**  
Parameter: Single worst case HAP emissions  
Limit: Single worst case HAP emissions are limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

\*\*\*

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

**Part 70 Quarterly Report**

Source Name: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004  
Facility: ~~Source-wide~~ **Line 2, Line 3, Line 4, Line 5, Line 6, and Line 7**  
Parameter: Total HAP emissions  
Limit: Total HAP emissions are limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

**Change No. 4**

RTO1 and RTO2 have been defined for control device requirements.

D.0.3 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

- (a) Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.0.1 and D.0.2, the Permittee shall operate ~~the thermal oxidizer~~ **RTO1 and RTO 2** at all times that the sheet coater booths are in operation.
- (b) The Permittee shall utilize a permanent total enclosure for the sheet coater booths (Lines 5, ~~and 6,~~ **and 7**) to achieve compliance with Condition D.0.2.

**Change No. 5**

RTO 2 has been added to the testing condition and compliance monitoring conditions and "the thermal oxidizer" is defined as RTO1. The timeframe for testing has also been changed.

D.0.6 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

In order to determine compliance with Conditions D.0.1 and D.0.3, the Permittee shall perform overall VOC control efficiency testing of ~~the thermal oxidizer~~ **RTO1 and RTO2**, temperature and fan amperage before ~~December 2012~~ **not later than one hundred eighty (180) days after issuance of this permit** utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Section C-Performance Testing contains the Permittee's obligations with regard to the records required by this condition.

\*\*\*

D.0.8 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on ~~the thermal oxidizer~~ **RTO1 and RTO2** 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 average. The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature determined from the most recent stack test.

\*\*\*

D.0.9 Parametric Monitoring [40 CFR 64]

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- (b) The duct pressure or fan amperage shall be observed at least once per day when ~~the thermal oxidizer~~ **RTO1 or RTO2** oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

**Change No. 6**

Line 7 has been added to the 326 IAC 8 requirements.

D.3.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]

\*\*\*

- (b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions of the ~~two (2)~~ **three (3)** ~~heatset offset litho press lines~~ **sheet coater booths** shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

\*\*\*

- (d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of ~~the~~ **each** thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = (V - E) / V \times 100$$

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 (26.53 lb/gal).

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

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

- (e) The overall efficiency of ~~the~~ **each** thermal oxidizer shall be greater than 61%, when using clear coating, 75% when using extreme performance coating, or 81% when using all other coatings.

### Change No. 7

Applicability of 326 IAC 8-3-3 has been removed because this source does not coat cans.

#### ~~D.3.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-3] [326 IAC 8-1-2]~~

- ~~(a) Pursuant to 326 IAC 8-2-3 (Can Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal sheets for the purpose of fabricating of metal cans shall be limited to 2.8 pounds of VOC per gallon of coating less water, delivered to the coating applicator from two-piece can exterior operations.~~
- ~~(b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions of the two (2) heatset offset litho press lines 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.~~

~~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 4.52.~~
- ~~(d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:~~

$$O = (V - E) / V \times 100$$

~~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 (26.53 lb/gal).~~

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

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

~~(e) — The overall efficiency of the thermal oxidizer shall be greater than 83%.~~

~~\*\*\*~~

#### D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.3.1 ~~and D.3.3~~, the Permittee shall operate ~~the thermal oxidizer~~ **RTO1 and RTO2** at all times that the sheet coater booths are in operation.

~~\*\*\*~~

#### D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 ~~and D.3.3~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

~~\*\*\*~~

#### D.3.8 Record Keeping Requirement

(a) To document compliance with Conditions D.3.1 ~~and D.3.3~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in Conditions D.3.1 ~~and D.3.3~~.

#### Standard language changes:

##### Change No. 1

Section B -Duty to Provide Information has been revised.

#### 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.

##### Change No. 2

IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule.

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all

instances of "the responsible official" to read "a responsible official."

To clarify that Section B - Certification only states what a certification must be, IDEM, OAQ has revised the condition.

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

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- ~~(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.~~
- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:**
- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and**
  - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.**
- (b) The Permittee may use the attached Certification Form, or its equivalent 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).

**Change No. 3**

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

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

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- (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 **that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).

**Change No. 4:**

IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan to be consistent with the rule.

IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timeline have been switched to "no later than" or "not later than".

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

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]

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**(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**

- (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.**

**The Permittee shall implement the PMPs.**

**(a)(b)** If required by specific condition(s) in Section D of this permit **where no PMP was previously required**, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) **no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later**, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

**The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

**The Permittee shall implement the PMPs.**

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- ~~(b)~~(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs **and their submittal** do not require ~~the~~ a certification that meets the requirements of 326 IAC 2-7-6(1) by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

#### Change No. 5

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-7-5(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.

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

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- \*\*\*
- (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:

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- (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 a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).

\*\*\*

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

#### **Change No. 6**

IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM, OAQ has removed Section B - Deviation from Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report.

#### ~~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.~~

### Change No. 7

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

#### B.165 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]

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- (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~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

### Change No. 8

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.

#### B.176 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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- (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 by the Permittee does require ~~the~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

\*\*\*

- (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, **pursuant to 326 IAC 2-7-4(a)(2)(D)**, in writing by IDEM, OAQ any additional information identified as being needed to process the application.

### Change No. 9

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet. IDEM, OAQ has decide to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already addresses this issue.

#### B.187 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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- (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~~ **does require a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Change No. 10**

IDEM, OAQ has decided to state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.

#### **B.198** Permit Revision Under Economic Incentives and Other Programs

~~[326 IAC 2-7-5(8)]~~[326 IAC 2-7-12(b)(2)]

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- (a) No Part 70 permit revision **or notice** 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.

#### **Change No. 11**

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

#### **B.2019** Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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- (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~~ **a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Change No. 12**

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

#### **B.232** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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- (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 a~~ a certification by ~~the a~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

**Change No. 13:**

IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

C.2 Opacity [326 IAC 5-1]

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

**Change No. 14:**

IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.

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

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The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 **or in this permit** and ~~326 IAC 9-1-2~~. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

**Change No. 15**

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

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

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- (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 **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

**Change No. 16**

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all

instances of "the responsible official" to read "a responsible official."

IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

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

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- (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:~~  
**For performance testing required by this permit, 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 a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "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 a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

#### Change No. 17

IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

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

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~~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.~~

#### Change No. 18

IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

#### C.143 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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**Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:**

- (a) ~~Upon detecting an excursion or exceedance,~~ the Permittee shall **take reasonable response steps** to 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~~ **The response** may include, but ~~are~~ **is** not limited to, the following:
- (1) initial inspection and evaluation;
  - (2) recording that operations returned to **or are returning 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 **normal or usual manner of operation. within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**

\*\*\*

- (e) **The Permittee shall record the reasonable response steps taken.**  
~~The Permittee shall maintain the following records:~~
- ~~(1) monitoring data;~~
  - ~~(2) monitor performance data, if applicable; and~~
  - ~~(3) corrective actions taken.~~

#### **Change No. 19**

IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timeline have been switched to "no later than" or "not later than".

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, OAQ, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

#### **C.154 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 **submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.** ~~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 **no later than** ~~within~~ one hundred **eighty (180)** ~~twenty (120)~~ days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred **eighty (180)** ~~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~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

#### Change No. 20

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

Paragraph (b) of Section C - Emission Statement has been removed. It was duplicative of the requirement in Section C - General Reporting Requirements.

#### C.165 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~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "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.~~

#### Change No. 21

The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

#### C.4716 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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- (b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, the **Permittee** shall be **allowed up to** ~~implemented within~~ ninety (90) days **from the date** of permit issuance or the date ~~ninety (90) days~~ of initial start-up, whichever is later, **to begin such record keeping.**

#### **Change No. 22**

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

#### **C.4817 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (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 **except that 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.** This report shall be submitted **not later than** ~~within~~ thirty (30) days **after** of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ **a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a "responsible official"** as defined by 326 IAC 2-7-1(34). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**
- (b) **The address for report submittal is:**  
~~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) **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.** ~~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).~~

#### **Change No. 23**

IDEM, OAQ has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

## Stratospheric Ozone Protection

### C.4918 Compliance with 40 CFR 82 and 326 IAC 22-1

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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.~~

### Change No. 24

IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

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

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The Permittee owns and operates a stationary punch press, printing, and sheet coating operation.

Source Address: 400 N. Walnut Street, Crawfordsville, IN 47933  
Mailing Address: ~~400 N. Walnut Street, Crawfordsville, IN 47933~~

### Change No. 25

For clarity, IDEM, OAQ has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to " Section C ... contains the Permittee's obligations with regard to the records required by this condition."

IDEM, OAQ has decided to clarify Section D - Testing Requirements.

#### D.0.6 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

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In order to determine compliance with Conditions D.0.1 and D.0.3, the Permittee shall perform overall VOC control efficiency testing of the thermal oxidizer, temperature and fan amperage before December 2012 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. ~~Testing shall be conducted in accordance with Section C - Performance Testing.~~  
**Section C - Performance Testing contains the Permittee's obligations with regard to the records required by this condition.**

### Change No. 26

For clarity, IDEM, OAQ has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to " Section C ... contains the Permittee's obligations with regard to the records required by this condition."

#### D.0.10 Record Keeping Requirements

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- (e) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~  
**Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

### Change No. 27

For clarity, IDEM, OAQ has changed references to the general conditions: "in accordance with

Section B", "in accordance with Section C", or other similar language, to " Section C ... contains the Permittee's obligations with regard to the records required by this condition."

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for the press line and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

**Change No. 28**

For clarity, IDEM, OAQ has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to " Section C ... contains the Permittee's obligations with regard to the records required by this condition."

D.1.6 Record Keeping Requirement

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- (b) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~  
**Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

**Change No. 29**

For clarity, IDEM, OAQ has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to " Section C ... contains the Permittee's obligations with regard to the records required by this condition."

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

---

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for the two press lines and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

**Change No. 30**

D.2.7 Record Keeping Requirement

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- (b) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~  
**Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

**Change No. 31**

For clarity, IDEM, OAQ has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to " Section C ... contains the Permittee's obligations with regard to the records required by this condition."

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

---

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for the sheet coater booths and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

**Change No. 32**

D.3.8 Record Keeping Requirement

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- (b) ~~All records shall be maintained in accordance with Section C - General Record Keeping~~

~~Requirements, of this permit.~~

**Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

**Change No. 33**

The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

**D.0.11 Reporting Requirements**

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A quarterly summary of the information to document **the compliance status** with Conditions D.0.1 and D.0.2 shall be submitted **not later than thirty (30) days after the end of the quarter being reported** 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.~~ **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

**Change No.34**

The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

**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: Crown Cork & Seal, Inc.  
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T 107-27624-00004

**Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_**

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, 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".

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

Material	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	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	Overall Control Efficiency for VOC 93.25%
<b>Line 7</b>										
3208-051	0.00260	6000.000	6.17	96.25	2310.05	421.58	0.00	0.00	100%	28.46

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)

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Permit Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % MIBK	Weight % Isophrone	Weight % Hexane	Weight % Ethyl Benzen	Weight % Formaldehyde	Weight % Cumene	Weight % Napthalene	Weight % Toluene	Xylene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Isophrone Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Cumene Emissions (ton/yr)				
<b>Line 7</b>																							
642 - W-260	8.80	0.00351	6000.000	3.00%				0.01%					24.35	0.00	0.00	0.00	0.06	0.00	0.00				
5061056	8.03	0.00351	6000.000								0.01%		0.00	0.00	0.00	0.00	0.00	0.00	0.00				
937-2624	8.02	0.00351	6000.000				0.06%						0.00	0.00	0.00	0.44	0.00	0.00	0.00				
29-899HV	8.00	0.00351	6000.000		1.40%	1.04%				0.10%			0.00	10.33	7.67	0.00	0.00	0.00	0.72				
9372015	7.97	0.00351	6000.000									0.06%	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
26S11AC	8.32	0.00351	6000.000						0.05%				0.00	0.00	0.00	0.00	0.00	0.37	0.00				
<b>"Worst Case" Individual HAP</b>													<b>24.4</b>	<b>10.3</b>	<b>7.7</b>	<b>0.4</b>	<b>0.06</b>	<b>0.4</b>	<b>0.72</b>				
<b>METHODOLOGY</b>													<b>Total HAPs</b>			<b>68.5</b>							

Total State Potential Emissions

**METHODOLOGY**

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
TO2**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

3.8

32.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.6	0.1	1.4

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
TO2**

**HAPs Emissions**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

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	3.449E-05	1.971E-05	1.232E-03	2.957E-02	5.585E-05

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	8.213E-06	1.807E-05	2.300E-05	6.242E-06	3.449E-05

Methodology is the same as previous page.

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: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

15.0

131.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.1	0.5	0.0	6.6	0.4	5.5

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 HAPs Emissions**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.380E-04	7.884E-05	4.928E-03	1.183E-01	2.234E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.285E-05	7.227E-05	9.198E-05	2.497E-05	1.380E-04

Methodology is the same as previous page.

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: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

8.0

70.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.1	0.3	0.0	3.5	0.2	2.9

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 HAPs Emissions**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.358E-05	4.205E-05	2.628E-03	6.307E-02	1.191E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.752E-05	3.854E-05	4.906E-05	1.332E-05	7.358E-05

Methodology is the same as previous page.

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: Emissions Calculations  
Summary of Modification**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

**Uncontrolled emissions from modification**

<b>Emission Unit</b>	<b>PM (tons/yr)</b>	<b>PM10 (tons/yr)</b>	<b>PM2.5 (tons/yr)</b>	<b>SO2 (tons/yr)</b>	<b>NOx (tons/yr)</b>	<b>VOC (tons/yr)</b>	<b>CO (tons/yr)</b>	<b>Single HAP (tons/yr)</b>	<b>Total HAP (tons/yr)</b>
<b>New Units</b>									
Line 7	0.00	0.00	0.00	0.00	0.00	421.58	0.00	24.35	68.47
Oven/TO2	0.03	0.12	0.12	0.01	1.64	0.09	1.38	0.03	0.03
<b>Existing Units</b>									
Ovens	0.12	0.50	0.50	0.04	6.57	0.36	5.52	0.12	0.12
RTO1	0.07	0.27	0.27	0.02	3.50	0.19	2.94	0.06	0.07
<b>Total</b>	<b>0.22</b>	<b>0.89</b>	<b>0.89</b>	<b>0.07</b>	<b>11.72</b>	<b>422.23</b>	<b>9.84</b>	<b>24.56</b>	<b>68.65</b>

**Appendix A: Emissions Calculations  
Summary of Modification**

**Company Name:** Crown Cork & Seal Company, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit Number:** T107-29194-00004, T107-29196-00004  
**Reviewer:** Jillian Bertram  
**Date:** April 26, 2010

Emission Unit	Emissions from the entire source after issuance							Total HAP (tons/yr)	Single HAP (tons/yr)
	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)			
Lines 2-7	0.00	0.00	0.00	0.00	245 *	0.00	24 **	<10	
TO2	0.03	0.12	0.01	1.64	0.09	1.38	0.03	0.03	
Insignificant Ovens	0.08	0.33	0.03	4.38	0.24	3.68	0.08	0.08	
RTO1	0.07	0.27	0.02	3.50	0.19	2.94	0.07	0.06	
<b>Total</b>	<b>0.18</b>	<b>0.72</b>	<b>0.06</b>	<b>9.52</b>	<b>245.52</b>	<b>8.00</b>	<b>24.18</b>	<b>&lt;10</b>	

\* Limits are pursuant to 326 IAC 2-2 Minor Limit

\*\* Limits are to remain an area source of HAPs.



# 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](http://www.idem.IN.gov)

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

**TO:** Thomas Jent  
Crown Cork & Seal Company, Inc  
400 N. Walnut St  
Crawfordsville, IN 47933

**DATE:** August 18, 2010

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

**SUBJECT:** Final Decision  
Significant Permit Modification  
107-29196-00004

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:  
George Go (Plant Manager)  
Michael Herron (Crown Cork & Seal Company, Inc)  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

August 18, 2010

TO: Crawfordsville Public Library

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

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

**Applicant Name: Crown Cork & Seal Company, Inc**  
**Permit Number: 107-29196-00004**

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 8/18/2010 Crown Cork & Seal Company, Inc. 107-29196-00004 (final)		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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Thomas Jent Crown Cork & Seal Company, Inc. 400 N Walnut St Crawfordsville IN 47933 (Source CAATS) via confirmed delivery										
2		George Go Plant Mgr Crown Cork & Seal Company, Inc. 400 N Walnut St Crawfordsville IN 47933 (RO CAATS)										
3		Crawfordsville City Council and Mayors Office 300 E. Pike St Crawfordsville IN 47933 (Local Official)										
4		Montgomery County Health Department 110 W. South Blvd Suite 100 Crawfordsville IN 47933-3351 (Health Department)										
5		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
6		Mr. Robert Ford RR 1, Box 233 New Ross IN 47968 (Affected Party)										
7		Ms. Magje Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)										
8		Montgomery County Commissioner 110 West South Boulevard Crawfordsville IN 47933 (Local Official)										
9		Crawfordsville County Public Library 222 South Washington Street Crawfordsville IN 47933 (Library)										
10		Michael Herron Crown Cork & Seal, Inc One Crown Way Philadelphia PA 19154 (Source & addl contact)										
11												
12												
13												
14												
15												

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<b>9</b>			