



# 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: December 29, 2011

RE: Silgan White Cap Corporation / 163-30180-00003

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

## Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

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

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

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

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

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

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

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

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

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

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



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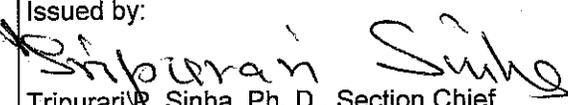
## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Silgan White Cap Corporation  
2201 West Maryland Street  
Evansville, Indiana 47712**

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

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

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

Operation Permit No.: T163-30180-00003	
Issued by:  Tripurari W. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 29, 2011  Expiration Date: December 29, 2016

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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 metal closures fabrication plant.

Source Address:	2201 West Maryland Street, Evansville, Indiana 47712
General Source Phone Number:	(812) 425-6221
SIC Code:	3466
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM <sub>2.5</sub> standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, under Nonattainment New Source Review Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) metal coating line, identified as Line 2701, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) roll coating operation; and
  - (2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.0 MMBtu/hr.
  
- (b) One (1) metal coating line, identified as Line 2702, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) roll coating operation; and
  - (2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.65 MMBtu/hr.
  
- (c) One (1) metal printing and coating line, identified as Line 2803, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) offset lithographic printing press;

- (2) One (1) roll coating operation; and
- (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 3.0 MMBtu/hr.
- (d) One (1) metal printing and coating line, identified as Line 2805, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1986, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) offset lithographic printing press;
  - (2) One (1) roll coating operation; and
  - (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 6.0 MMBtu/hr.
- (e) One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day, using fiberglass filters for particulate control.

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):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: one (1) Bryan boiler, constructed in 1996, with a maximum heat input capacity of 0.45 MMBtu/hr. [326 IAC 6-2-4]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Sixteen (16) Plastisol Line curing ovens, with maximum heat input capacities ranging from 0.45 to 5.2 MMBtu/hr [326 IAC 6-2-4];
  - (2) Eighteen (18) space heaters, each with a maximum heat input capacity of 0.17 MMBtu/hr [326 IAC 6-2-4];
  - (3) Three (3) rapid air units, each with a maximum heat input capacity of 7.435 MMBtu/hr, and one (1) rapid air unit with a maximum heat input capacity of 1.25 MMBtu/hr [326 IAC 6-2-4];
  - (4) One (1) mix room heater, with a maximum heat input capacity of 0.60 MMBtu/hr [326 IAC 6-2-4];
  - (5) One (1) Plastisol Line 4114 burner, with a maximum heat input capacity of 0.12 MMBtu/hr [326 IAC 6-2-4]; and
  - (6) Four (4) cap manufacturing curing ovens (Press Lines), each with a maximum heat capacity of 0.8 MMBtu/hr. [326 IAC 6-2-4]
- (c) Seven (7) scroll shears, constructed in 1970, each with a line speed of 24 metal sheets per minute.

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)]**

- (a) This permit, T163-30180-00003, 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)]**

- (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)]**

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

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
  - (2) 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)]

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

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

and

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

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

The submittal by the Permittee does require 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.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]

(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 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).

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

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

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- (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, or Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

- (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 T163-30180-00003 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 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]**

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- (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 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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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 thirty percent (30%) 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 except as provided in 326 IAC 4-2 or in this permit. 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.

#### 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, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 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).

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 excess 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 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 after the date 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(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require 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]**

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- (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.18 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 applicable standards for recycling and emissions reduction.

## SECTION D.1

## EMISSION UNIT OPERATION CONDITIONS

### Emission Unit Description [326 IAC 2-7-5(15)]:

- (a) One (1) metal coating line, identified as Line 2701, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) roll coating operation; and
  - (2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.0 MMBtu/hr.
- (b) One (1) metal coating line, identified as Line 2702, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) roll coating operation; and
  - (2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.65 MMBtu/hr.
- (c) One (1) metal printing and coating line, identified as Line 2803, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) offset lithographic printing press;
  - (2) One (1) roll coating operation; and
  - (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 3.0 MMBtu/hr.
- (d) One (1) metal printing and coating line, identified as Line 2805, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1986, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) offset lithographic printing press;
  - (2) One (1) roll coating operation; and
  - (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 6.0 MMBtu/hr.

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

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

### D.1.1 Prevention of Significant Deterioration (PSD) Minor Source Limit [326 IAC 2-2]

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VOC emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 233.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits in addition to PTE of the two (2) lithographic printing presses and insignificant activities is equivalent to VOC emissions from the entire source of less than 250 tons per year and will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the entire source.

### D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-3] [326 IAC 8-1-2]

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- (a) Pursuant to 326 IAC 8-2-3, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of two and eight-tenths (2.8) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at the roll coating operation on Line 2805.
- (b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the roll coating operation on Line 2805 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:

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

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).

The equivalent pounds of VOC per gallon of coating solids as applied (E) shall be limited to less than 2.90 pounds of VOC per gallon of coating solids (L is equal to 2.8 lb/gal and D is equal to 7.36 lb/gal).

- (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.

Based on this equation and a coating with a VOC content of 39.34 pounds per gallon of coating solids, the Permittee shall operate the thermal oxidizer at an overall control efficiency of at least 88.5% (E is equal to 4.52 lb/gal coating solids for the coating with a VOC Content of 39.34 lb/gal coating solids).

**D.1.3 Hazardous Air Pollutants (HAP) Limitations [40 CFR 63]**

- (a) The single Hazardous Air Pollutant (HAP) emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 9.95 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The combined Hazardous Air Pollutant (HAP) emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 22.30 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, together with the uncontrolled potential to emit HAP from all other emission units at the source, shall limit single HAP emitted from the entire source to less than ten (10) tons per year and shall limit any combination of HAPs emitted from the entire source to less than twenty-five (25) tons per year. Compliance with this limit renders the source an "area source" of HAP emissions.

**D.1.4 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]**

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows.

Combustion Unit	Q MMBtu/hr	Pt lb/MMBtu (Q <10)
Line 2701 curing oven	11.65	0.87
Line 2702 curing oven		
Line 2803 curing oven		

The PM emission limit was calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

- where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise.
- h = Stack height in feet.
- Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
- N = Number of stacks.

**D.1.5 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows.

Combustion Unit	Q MMBtu/hr	Pt lb/MMBtu (Q <10)
Line 2805 curing oven	116.515	0.32

The PM emission limits were calculated using the following equation:

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input  
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan is required for the four (4) roll coating operations (on Lines 2701, 2702, 2803 and 2805), and the Cannister RTO thermal oxidizer. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

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

#### D.1.7 Thermal Oxidizer Operation

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In order to ensure compliance with Conditions D.1.1, D.1.2, and D.1.3, the Cannister RTO shall be in operation whenever Lines 2701, 2702, 2803, or 2805 are in operation.

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

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

#### D.1.9 Volatile Organic Compounds (VOC)

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In order to ensure compliance with the VOC emission limitations in Condition D.1.1, the Permittee shall use the following methodology to calculate VOC emissions:

$$\text{VOC emissions} = \sum [ U_C \times C_{\text{VOC}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U / 2000 \text{ lb/ton}$$

Where  $U_C$  = Coating usage, gal/month  
 $C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water  
DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_U$  = Uncontrolled VOC Emissions, lb/month

#### D.1.10 Hazardous Air Pollutants (HAPs)

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In order to ensure compliance with the HAP emission limitations in Condition D.1.3, the Permittee shall use the following methodology to calculate single and combined HAP emissions:

$$\text{HAP emissions} = \sum [ U_C \times C_{\text{VOC}} \times C_{\text{HAP}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U / 2000 \text{ lb/ton}$$

Where  $U_C$  = Coating usage, gal/month  
 $C_{VOC}$  = VOC Content, lb/gal coating, less water  
 $C_{HAP}$  = HAP Content, Weight %  
DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_U$  = Uncontrolled HAP Emissions, lb/month

#### D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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- (a) In order to demonstrate the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall conduct inlet and outlet VOC emissions testing to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) for the Cannister RTO.
- (b) In order to demonstrate the compliance status with Condition D.1.3, the Permittee shall perform HAP emissions testing at the outlet of the Cannister RTO, utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM.

Testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration utilizing methods as approved by the Commissioner. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

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

##### D.1.12 Thermal Oxidizer Temperature [40 CFR Part 64]

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In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, a continuous monitoring system shall be calibrated, maintained, and operated on the Cannister RTO for measuring operating temperature. For the purposes of this condition, continuous shall mean no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps whenever the 3-hour average temperature of the thermal oxidizer is below the temperature for the most recent valid compliance demonstration. A 3-hour average temperature that is below temperature for the most recent valid compliance demonstration is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

##### D.1.13 Parametric Monitoring

---

In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3:

- (a) The Permittee shall record the duct pressure associated with operation of the thermal oxidizer at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure is outside the normal range of  $-0.5$  to  $-3.5$  inches of water, or the duct pressure established by most recent valid compliance demonstration, the Permittee shall take reasonable response steps. A duct pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.

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

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

#### D.1.14 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used less water on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month; and
  - (4) The total VOC usage for each month;
- (b) To document the compliance status with the single and combined HAP limits in Condition D.1.3, 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 usage limits established for this source.
  - (1) The amount and HAP content of each coating material and solvent used. Records shall include inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used.
  - (2) The single and combined HAP usage for each month.
  - (3) The single and combined HAP emissions for each month, using the methodology in Condition D.1.9.
- (c) To document the compliance status with Condition D.1.12, the Permittee shall maintain continuous records (on a three-hour average) of thermal oxidizer temperature.
- (d) To document the compliance status with Condition D.1.13, the Permittee shall maintain daily records of duct pressure. The Permittee shall include in its daily record when a duct pressure reading is not taken and the reason for the lack of a reading (e.g. the process did not operate that day).
- (e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

#### D.1.15 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days following the end of each quarter. 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 C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

## SECTION D.2 EMISSION UNIT OPERATION CONDITIONS

### Emission Unit Description [326 IAC 2-7-5(15)]:

- (e) One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day, and a minimum batch time of 30 minutes, using fiberglass filters for particulate control.

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

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

#### D.2.1 PM Limitations [326 IAC 6.5]

PM emissions from the compound manufacturing operation shall not exceed 1.60 pounds per hour (lb/hr).

Compliance with the above limit, together with the uncontrolled potential to emit PM from all other emission units at the source, shall limit PM emissions from the entire source to less than ten (10) tons per year, and will render the requirements of 326 IAC 6.5 (PM Limitations Except Lake County) not applicable to this source.

#### D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the compound manufacturing operation shall not exceed 3.63 pounds per hour when operating at a process weight rate of 0.83 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the compound manufacturing operation and the fiberglass filters. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to preventive maintenance plans.

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

#### D.2.4 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall perform testing of the PM emissions from the compound manufacturing operation, when plastisol is being added to the process, within one hundred eighty (180) days of issuance of T163-30180-00003. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) 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 required by this condition.

#### D.2.5 Particulate Control [326 IAC 2-7-6(6)]

The filters for particulate control shall be in operation and controlling particulate, at all times when plastisol is being added to the compound manufacturing operation.

**SECTION D.3 EMISSION UNIT OPERATION CONDITIONS**

**Emission Unit Description [326 IAC 2-7-5(15)]: Insignificant Activities**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: one (1) Bryan boiler, constructed in 1996, with a maximum heat input capacity of 0.45 MMBtu/hr.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Sixteen (16) Plastisol Line curing ovens, with maximum heat input capacities ranging from 0.45 to 5.2 MMBtu/hr;
  - (2) Eighteen (18) space heaters, each with a maximum heat input capacity of 0.17 MMBtu/hr;
  - (3) Three (3) rapid air units, each with a maximum heat input capacity of 7.435 MMBtu/hr, and one (1) rapid air unit with a maximum heat input capacity of 1.25 MMBtu/hr;
  - (4) One (1) mix room heater, with a maximum heat input capacity of 0.60 MMBtu/hr;
  - (5) One (1) Plastisol Line 4114 burner, with a maximum heat input capacity of 0.12 MMBtu/hr; and
  - (6) Four (4) cap manufacturing curing ovens (Press Lines), each with a maximum heat capacity of 0.8 MMBtu/hr.

(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 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows.

Combustion Unit	Q MMBtu/hr	Pt lb/MMBtu (Q <10)
Bryan Boiler	116.965	0.32
16 Plastisol Line curing ovens	116.515	0.32
18 indirect space heaters		
3 rapid air units		
mix room indirect heater		
Plastisol Line 4114 burner		
Cap Manufacturing curing ovens		

The PM emission limits were calculated using the following equation:

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Silgan White Cap Corporation  
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712  
Part 70 Permit No.: T163-30180-00003

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Silgan White Cap Corporation  
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712  
Part 70 Permit No.: T163-30180-00003

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance and Enforcement Branch); and</li><li>• The Permittee must submit notice in writing or by facsimile no later than two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
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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? <input type="checkbox"/> Y <input type="checkbox"/> N Describe:
Type of Pollutants Emitted: <input type="checkbox"/> TSP <input type="checkbox"/> PM-10 <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> VOC <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> 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: \_\_\_\_\_

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

Source Name: Silgan White Cap Corporation  
 Source Address: 2201 West Maryland Street, Evansville, Indiana 47712  
 Part 70 Permit No.: T163-30180-00003  
 Facility: Four (4) roll coating operations on Lines 2701, 2702, 2803 and 2805  
 Parameter: VOCEmissions  
 Limit: 233 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

$$\text{VOC emissions} = \sum [ U_c \times C_{\text{VOC}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_u$$

Where  $U_c$  = Coating usage, gal/month  
 $C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water  
 DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
 CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_u$  = Uncontrolled VOC Emissions, lb/month

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	VOC Input for This Month (tons)	VOC Input for Previous 11 Months (tons)	VOC Input for 12-Month Period (tons)

- No deviation occurred in this quarter.
- Deviations occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted By: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

Source Name: Silgan White Cap Corporation  
 Source Address: 2201 West Maryland Street, Evansville, Indiana 47712  
 Part 70 Permit No.: T163-30180-00003  
 Facility: Entire Source  
 Parameter: Single HAP Emissions  
 Limit: The single HAP emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

$$\text{HAP emissions} = \sum [ U_C \times C_{\text{VOC}} \times C_{\text{HAP}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U$$

Where  $U_C$  = Coating usage, gal/month  
 $C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water  
 $C_{\text{HAP}}$  = HAP Content, Weight %  
 DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
 CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_U$  = Uncontrolled HAP Emissions, lb/month

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	HAP Input for This Month (tons)	HAP Input for Previous 11 Months (tons)	HAP Input for 12-Month Period (tons)

- No deviation occurred in this quarter.
- Deviations occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted By: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

Source Name: Silgan White Cap Corporation  
 Source Address: 2201 West Maryland Street, Evansville, Indiana 47712  
 Part 70 Permit No.: T163-30180-00003  
 Facility: Entire Source  
 Parameter: Combined HAP Emissions  
 Limit: The combined HAP emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 23.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

$$\text{HAP emissions} = \sum [ U_C \times C_{\text{VOC}} \times C_{\text{HAP}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U$$

Where  $U_C$  = Coating usage, gal/month  
 $C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water  
 $C_{\text{HAP}}$  = HAP Content, Weight %  
 DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
 CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_U$  = Uncontrolled HAP Emissions, lb/month

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	HAP Input for This Month (tons)	HAP Input for Previous 11 Months (tons)	HAP Input for 12-Month Period (tons)

- No deviation occurred in this quarter.
- Deviations occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted By: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

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

**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Silgan White Cap Corporation  
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712  
Part 70 Permit No.: T163-30180-00003

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

Page 1 of 2

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".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<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: \_\_\_\_\_

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

### Source Description and Location

Source Name:	Silgan White Cap Corporation
Source Location:	2201 West Maryland Street, Evansville, Indiana 47712
County:	Vanderburgh
SIC Code:	3466
Permit Renewal No.:	T163-30180-00003
Permit Reviewer:	Kimberly Cottrell

### Public Notice Information

On November 4, 2011, the Office of Air Quality (OAQ) had a notice published in Evansville Courier in Evansville, Indiana, stating that the Silgan White Cap Corporation had applied to renew their Part 70 Operating Permit Renewal issued on November 13, 2006. The notice also stated that OAQ proposed to issue a permit 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.

### Silgan Comments and IDEM's Responses

On November 1, 2011, and November 4, 2011, OAQ received comments from Timothy R. White, on behalf of Silgan White Cap Corporation. The summary of the comments and IDEM, OAQ responses, including changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

#### Company Comment 1:

The Table of Contents lists D.2.6, D.2.7, D.2.8, and D.2.9; however, these conditions are not in the permit.

#### IDEM Response:

IDEM has updated the Table of Contents to remove the reference to these conditions, as they do not exist for this permit.

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

~~D.2.6 Visible Emissions Notations~~

~~D.2.7 Parametric Monitoring (Dust Collector)~~

~~D.2.8 Broken or Failed Bag Detection~~

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

~~D.2.9 Record Keeping Requirements~~

### Company Comment 2:

The general Source Number listed in Condition A.1 is incorrect. The correct number is (812) 425-6221.

### IDEM Response:

Condition A.1 is updated as follows:

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

The Permittee owns and operates a stationary metal closures fabrication plant.

General Source Phone Number: ~~(812) 467-9644~~ **(812) 425-6221**

### Company Comment 3:

- (A) In Condition D.1.2(b), the draft permit states "(L is equal to 2.3 lb/gal and...)". According to 326 IAC 8-2-3(b)(1), the applicable emission limit is 2.8 lb/gal.
- (B) In Condition D.1.2(b), the draft permit states "... and D is equal to 11.19 lb/gal)". D is defined as the baseline solvent density of VOC in the coating ... per gallon of solvent. The value of 11.19 is the baseline coating density. The baseline solvent density is 7.36 lb/gal.
- (C) In Condition D.1.2(c), the draft permit should be updated to reflect the correct calculation of "E" and "O" based on the corrected values for "L" and "D" from paragraph (b). Silgan calculates that E = 4.52 lb/gal and O = 88.5%.

### IDEM Response:

Condition D.1.2 is updated as follows:

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-3] [326 IAC 8-1-2]

- (a) ...
- (b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the roll coating operation on Line 2805 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:

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

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).

The equivalent pounds of VOC per gallon of coating solids as applied (E) shall be limited to less than 2.90 pounds of VOC per gallon of coating solids (L is equal to ~~2.3~~ **2.8** lb/gal and D is equal to ~~44.19~~ **7.36** lb/gal).

- (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.

Based on this equation and a coating with a VOC content of 39.34 pounds per gallon of coating solids, the Permittee shall operate the thermal oxidizer at an overall control efficiency of at least ~~91.67%~~ **88.5%** (E is equal to ~~3.28~~ **4.52** lb/gal coating solids for the coating with a VOC Content of 39.34 lb/gal coating solids).

#### Company Comment 4:

The formula for VOC emissions in Condition D.1.9 is incorrect. The equation contains two different units of measurement, ton/month and lb/month.

#### IDEM Response:

The methodology to calculate VOC emissions in Condition D.1.9 is updated as follows:

#### D.1.9 Volatile Organic Compounds (VOC)

In order to ensure compliance with the VOC emission limitations in Condition D.1.1, the Permittee shall use the following methodology to calculate VOC emissions:

$$\text{VOC emissions} = \sum [ U_C \times C_{\text{VOC}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U / 2000 \text{ lb/ton}$$

- Where  $U_C$  = Coating usage, gal/month  
 $C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water  
DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_U$  = Uncontrolled VOC Emissions, lb/month

#### Company Comment 5:

Silgan needs an explanation of what  $E_U$  (Uncontrolled VOC Emissions) encompasses so that  $E_U$  can be quantified.

**IDEM Response:**

$E_U$  (Uncontrolled VOC Emissions) encompasses all VOC emissions from the process that are not routed to the fired thermal oxidizer (Cannister RTO) for control.

**Company Comment 6:**

The formula for HAP emissions in Condition D.1.10 is incorrect. The equation contains two different units of measurement, ton/month and lb/month.

**IDEM Response:**

The methodology to calculate HAP emissions in Condition D.1.10 is updated as follows:

**D.1.10 Hazardous Air Pollutants (HAPs)**

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In order to ensure compliance with the HAP emission limitations in Condition D.1.3, the Permittee shall use the following methodology to calculate single and combined HAP emissions:

$$\text{HAP emissions} = \sum [ U_C \times C_{\text{VOC}} \times C_{\text{HAP}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U / 2000 \text{ lb/ton}$$

Where  $U_C$  = Coating usage, gal/month  
 $C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water  
 $C_{\text{HAP}}$  = HAP Content, Weight %  
DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_U$  = Uncontrolled HAP Emissions, lb/month

**Company Comment 7:**

Silgan needs an explanation of what  $E_U$  (Uncontrolled HAP Emissions) encompasses so that  $E_U$  can be quantified.

**IDEM Response:**

$E_U$  (Uncontrolled HAP Emissions) encompasses all HAP emissions from the process that are not routed to the fired thermal oxidizer (Cannister RTO) for control.

**Company Comment 8:**

The requirement in Condition D.2.4 to perform testing of the PM emissions from the compound manufacturing operation every five (5) years is redundant.

**IDEM Response:**

Repeat testing is required once per permit term in order to ensure that the filters used to reduce PM emissions from the compound manufacturing operation demonstrate continued compliance with the PM emission limitations in Conditions D.2.1 and D.2.2. There are no changes to Condition D.2.4 as a result of this comment.

**Company Comment 9:**

In Condition D.2.5, the word "fiberglass" should be removed because it is too restrictive on the type of filter allowable.

**IDEM Response:**

IDEM agrees that it is not necessary to specify the type of filter that should be used for the compound manufacturing operation. Condition D.2.5 is updated as follows:

**D.2.5 Particulate Control [326 IAC 2-7-6(6)]**

(1) The ~~fiberglass~~ filters for particulate control shall be in operation and controlling particulate, at all times when plastisol is being added to the compound manufacturing operation.

**Company Comment 10:**

On page 1 of the Emission Calculations (Appendix A for the TSD), For the second table, Limited PTE, shouldn't the Limited PM emissions be 73.00 instead of 7.00?

**IDEM Response:**

No. In Condition D.2.1, the PM emissions from the compound manufacturing operation are limited to PM emissions from the compound manufacturing operation shall not exceed 1.60 pounds per hour (lb/hr). This restriction equates to 7.0 tons per year of PM emissions, not 73.0. PM<sub>10</sub> and PM<sub>2.5</sub> emissions are limited by state or federal requirements; therefore the Limited emissions are equal to the potential emissions. There are no changes to the permit as a result of this comment.

<b>IDEM Contact</b>
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Questions regarding this proposed permit can be directed to:

Kimberly Cottrell  
Indiana Department Environmental Management  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53, Room 1003  
Indianapolis, Indiana 46204-2251  
Toll free (within Indiana): 1-800-451-6027 extension 3-0870  
Or dial directly: (317) 233-0870  
kcottrel@idem.in.gov

Please refer to Part 70 Operating Permit Renewal No. T163-30180-00003 in all correspondence.

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

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

**Source Background and Description**

Source Name:	Silgan White Cap Corporation
Source Location:	2201 West Maryland Street, Evansville, Indiana 47712
County:	Vanderburgh
SIC Code:	3466
Permit Renewal No.:	T163-30180-00003
Permit Reviewer:	Kimberly Cottrell

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Silgan White Cap Corporation relating to the operation of a stationary metal closures fabrication plant. On February 3, 2011, Silgan White Cap Corporation submitted an application to the OAQ requesting to renew its operating permit. Silgan White Cap Corporation was issued its first Part 70 Operating Permit Renewal (T163-17602-00003) on November 13, 2006.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) metal coating line, identified as Line 2701, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) roll coating operation; and
  - (2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.0 MMBtu/hr.
  
- (b) One (1) metal coating line, identified as Line 2702, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) roll coating operation; and
  - (2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.65 MMBtu/hr.
  
- (c) One (1) metal printing and coating line, identified as Line 2803, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) offset lithographic printing press;
  - (2) One (1) roll coating operation; and

- (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 3.0 MMBtu/hr.
- (d) One (1) metal printing and coating line, identified as Line 2805, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1986, using a 6.0 MMBtu/hr natural gas-fired thermal oxidizer (Cannister RTO) as VOC control, exhausting to one (1) stack, identified as Cannister RTO, and consisting of the following equipment:
  - (1) One (1) offset lithographic printing press;
  - (2) One (1) roll coating operation; and
  - (3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 6.0 MMBtu/hr.
- (e) One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day, and a 30 minute batch time, using fiberglass filters for particulate control.

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

The source did not get the proper permitting approval for the following emission unit:

One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day, using baghouse for particulate control.

This emission unit was originally added to the permit through an administrative amendment; however, potential emissions calculations for this renewal revealed that this is a significant emissions unit that should have been permitted as a significant source modification.

#### **Emission Units and Pollution Control Equipment Removed From the Source**

The source has not removed any emission units since the last renewal.

#### **Insignificant Activities**

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: one (1) Bryan boiler, constructed in 1996, with a maximum heat input capacity of 0.45 MMBtu/hr. [326 IAC 6-2-4]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Sixteen (16) Plastisol Line curing ovens, with maximum heat input capacities ranging from 0.45 to 5.2 MMBtu/hr [326 IAC 6-2-4];
  - (2) Eighteen (18) space heaters, each with a maximum heat input capacity of 0.17 MMBtu/hr [326 IAC 6-2-4];
  - (3) Three (3) rapid air units, each with a maximum heat input capacity of 7.435 MMBtu/hr, and one (1) rapid air unit with a maximum heat input capacity of 1.25 MMBtu/hr [326 IAC 6-2-4];

- (4) One (1) mix room heater, with a maximum heat input capacity of 0.60 MMBtu/hr [326 IAC 6-2-4];
  - (5) One (1) Plastisol Line 4114 burner, with a maximum heat input capacity of 0.12 MMBtu/hr [326 IAC 6-2-4]; and
  - (6) Four (4) cap manufacturing curing ovens (Press Lines), each with a maximum heat capacity of 0.8 MMBtu/hr. [326 IAC 6-2-4]
- (c) The following VOC and HAP storage containers:
- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; and
  - (2) Vessels storing lubricating oils, hydraulic oils, and machining fluids.
- (d) Packaging lubricants and greases.
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Cleaners and solvents characterized as follows:
- (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F); or
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (g) Heat exchanger cleaning and repair.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) Seven (7) scroll shears, constructed in 1970, each with a line speed of 24 metal sheets per minute;
  - (2) Two (2) waxers; and
  - (3) One (1) UV Printing Line, identified as UV-1-2804.

<b>Existing Approvals</b>
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Since the issuance of the Part 70 Operating Permit Renewal, T163-17602-00003, on November 13, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 163-25278-00003, issued on October 18, 2007;
- (b) Administrative Amendment No. 163-27430-00003, issued on February 5, 2009; and

- (c) Administrative Amendment No. 163-27482-00003, issued on February 17, 2009.

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

#### Enforcement Issue

IDEM is aware that equipment has been constructed (and/or operated) prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit". IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations.

#### County Attainment Status

The source is located in Vanderburgh County.

<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, 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> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour designation was revoked effective June 15, 2005.  
Basic nonattainment designation effective federally April 5, 2005, for PM<sub>2.5</sub>.

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM<sub>2.5</sub> promulgated on May 8, 2008. 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**  
 Vanderburgh County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead. 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.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

<b>Table 2: Unrestricted Potential Emissions</b>	
<b>Pollutant</b>	<b>Tons/year</b>
CO	45.24
CO <sub>2</sub> e	65,024
NO <sub>x</sub>	53.86
PM	75.79
PM <sub>10</sub>	78.86
PM <sub>2.5</sub>	78.86
SO <sub>2</sub>	0.32
VOC	1,574.34
HAP 2-(2-butoxyethoxy) ethanol	34.13
HAP 2-butoxyethyl acetate	86.62
HAP cumene	8.89
HAP ethylbenzene	29.21
HAP formaldehyde	2.02
HAP diethylene glycol monoethyl ether	46.15
HAP hexane	1.28
HAP isophorone	47.29
HAP methanol	0.28
HAP manganese	0.94
HAP MIBK	155.01
HAP naphthalene	26.73
HAP toluene	2.72
HAP xylene	139.00
Total HAP	195.97

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of greenhouse gases (GHGs) is less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Actual Emissions**

The following table shows the actual emissions as reported by the source. This information reflects the 2009 OAQ emission data.

<b>Table 3: Actual Emissions</b>	
<b>Pollutant</b>	<b>Actual Emissions (ton/year)</b>
CO	5.87
NO <sub>x</sub>	3.50
PM	0.16
PM <sub>10</sub>	0.69
PM <sub>2.5</sub>	0.69
SO <sub>2</sub>	0.04
VOC	33.45

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

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

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit Renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	CO	NO <sub>x</sub>	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO <sub>2</sub> e	Single HAP	Total HAPs
Roll Coating Operations	0	0	0	0	0	0	233.00	0	9.95	22.30
Lithographic Printing Presses	0	0	0	0	0	0	3.00	0	1.26 (Mn)	1.62
Compound Manufacturing	0	0	7.00	73.00	73.00	0	0	0	0	0
UV Ink Process	0	0	0	0	0	0	0.0157	0	0	0.0157
Solvent Cleaning	0	0	0	0	0	0	8.76	0	0	0
Scroll Shears	0	0	1.77	1.77	1.77	0	0	0	0	0
Natural Gas Combustion	45.24	53.86	1.02	4.09	4.09	0.32	2.96	65,024	0	1.02
<b>Total PTE of Entire Source</b>	<b>45.24</b>	<b>53.86</b>	<b>9.79</b>	<b>78.86</b>	<b>78.86</b>	<b>0.32</b>	<b>246.99</b>	<b>65,024</b>	<b>9.95</b>	<b>24.95</b>
Title V Major Source Threshold	100	100	100	100	100	100	100	100,000	10	25
PSD Major Source Threshold	250	250	250	250	NA	250	250	100,000	10	25
Nonattainment NSR Major Source Threshold	NA	NA	NA	NA	100	NA	NA	NA	NA	NA

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), not particulate matter (PM), is considered as a "regulated air pollutant".

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant are less than two hundred fifty (<250) tons per year, the source-wide emissions of CO<sub>2</sub>e are less than 100,000 tons per year; and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Nonattainment NSR because the emissions of the nonattainment pollutant, PM<sub>2.5</sub>, are less than one hundred (<100) tons per year.

<b>Federal Rule Applicability</b>
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The following federal rules are applicable to the source:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit renewal.
  - (1) The two (2) offset lithographic printing presses (on Lines 2803 and 2805) are not subject to the requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 326 IAC 12 (40 CFR Part 60, Subpart QQ) because the presses are not rotogravure printing presses.
  - (2) The Bryan boiler is not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units (326 IAC 12) because the maximum heat input of this boiler is less than 10 MMBtu per hour.
  - (3) The VOC and HAP storage tanks are not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification commenced after July 23, 1984, because the maximum storage capacities of these storage tanks are less than 75 cubic meters (19,813 gallons).

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

Since the unrestricted potential to emit of this source is greater than ten (10) tons per year of single HAPs and greater than twenty-five (25) tons per year of total HAPs, this source has elected to limit the potential to emit of this source as follows:

- (A) The single Hazardous Air Pollutant (HAP) emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 8.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (B) The combined Hazardous Air Pollutant (HAP) emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 23.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, together with the uncontrolled potential to emit HAP from all other emission units at the source, shall limit single HAP emitted from the entire source to less than ten (10) tons per year and shall limit any combination of HAPs emitted from the entire source to less than twenty-five (25) tons per year. Compliance with this limit renders the source an "area source" of HAP emissions.

- (1) 40 CFR Part 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry) - not applicable  
The requirements of the 40 CFR Part 63, Subpart KK, 326 IAC 20 (National Emission Standards for the Printing and Publishing Industry) are not included in this permit for the two (2) offset lithographic printing presses (on Lines 2803 and 2805) because the presses are not rotogravure or flexographic printing presses.
- (2) 40 CFR Part 63, Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating) - not applicable  
The requirements of the 40 CFR Part 63, Subpart JJJJ, 326 IAC 20 (National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating) are not included in this permit for the sheet coating operations on Lines 2701, 2702, 2803, and 2805 because these sheet coating operations are not web coating lines as defined in 40 CFR 63.3310, and this source is minor for HAPs.
- (3) 40 CFR Part 63, Subpart KKKK (National Emission Standard for Surface Coating: Metal Cans) - not applicable  
The sheet coating operations on Lines 2701, 2702, 2803 and 2805 are not subject to the requirements of 40 CFR Part 63, Subpart KKKK (National Emission Standard for Surface Coating: Metal Cans) because they perform surface coating of metal parts at a source that is minor for HAPs.
- (4) 40 CFR Part 63, Subpart MMMM (National Emission Standard for Surface Coating of Miscellaneous Metal Parts and Products) - not applicable  
The sheet coating operations on Lines 2701, 2702, 2803 and 2805 are not subject to the requirements of 40 CFR Part 63, Subpart MMMM (National Emission Standard for Surface Coating of Miscellaneous Metal Parts and Products) because they perform surface coating of metal parts at a source that is minor for HAPs.
- (5) 40 CFR Part 63, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) - not applicable  
The sheet coating operations on Lines 2701, 2702, 2803 and 2805 are not

subject to the requirements of 40 CFR Part 63, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) because they do not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes, and they do not perform Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

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

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

<b>Table 5: Compliance Assurance Monitoring (CAM) Evaluation</b>							
<b>Emission Unit / Pollutant</b>	<b>Control Device Used</b>	<b>Emission Limitation (Y/N)</b>	<b>Uncontrolled PTE (tons/year)</b>	<b>Controlled PTE (tons/year)</b>	<b>Major Source Threshold (tons/year)</b>	<b>CAM Applicable (Y/N)</b>	<b>Large Unit (Y/N)</b>
Line 2701 Roll Coater - VOC	RTO	Y	415.20	62.00	100	Y	N
Line 2701 Roll Coater - single HAP	RTO	Y	43.41	2.79	10	Y	N
Line 2701 Roll Coater - total HAP	RTO	Y	49.74	5.73	25	Y	N
Line 2702 Roll Coater - VOC	RTO	Y	415.20	62.00	100	Y	N
Line 2702 Roll Coater - single HAP	RTO	Y	43.41	2.79	10	Y	N
Line 2702 Roll Coater - total HAP	RTO	Y	49.74	5.73	25	Y	N
Line 2803 Roll Coater - VOC	RTO	Y	364.97	54.50	100	Y	N
Line 2803 Roll Coater - single HAP	RTO	Y	37.22	2.66	10	Y	N
Line 2803 Roll Coater - total HAP	RTO	Y	49.67	5.72	25	Y	N
Line 2805 Roll Coater - VOC	RTO	Y	364.97	54.50	100	Y	N
Line 2805 Roll Coater - single HAP	RTO	Y	43.41	2.79	10	Y	N
Line 2805 Roll Coater - total HAP	RTO	Y	44.57	5.13	25	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the Roll Coating Operations (Lines 2701, 2702, 2803, and 2805) for single HAPs and total HAPs. The Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

### State Rule Applicability - Entire Source

The following state rules are applicable to the entire source:

#### **326 IAC 1-6-3 (Preventive Maintenance Plan)**

The source is subject to 326 IAC 1-6-3.

#### **326 IAC 1-5-2 (Emergency Reduction Plans)**

The source is subject to 326 IAC 1-5-2.

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

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM<sub>10</sub> is less than 250 tons per year; and the potential to emit of CO, NO<sub>x</sub>, and SO<sub>2</sub> is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(3), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2012, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### **326 IAC 5-1 (Opacity Limitations)**

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2) because the source is located in the city of Evansville, Indiana, in Vanderburgh County.

#### **326 IAC 6-4 (Fugitive Dust)**

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.

#### **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

Although located in the City of Evansville in Vanderburgh County, the potential fugitive particulate matter emissions from this source are less than twenty-five (25) tons per year. Also, pursuant to 326 IAC 6-5-1(b), Line 2805 was constructed after December 13, 1985 and fugitive particulate emissions are expected to be negligible for Line 2805. Therefore, this source is not subject to the requirements of 326 IAC 6-5.

#### **326 IAC 9 (Carbon Monoxide Emission Limits)**

The source is not subject to 326 IAC 9 because it commenced operation before March 21, 1972 and does not operate a petroleum refinery, ferrous metal smelter, or a refuse incinerator.

### State Rule Applicability – Individual Facilities

The following state rules are applicable to individual facilities at the source:

#### **326 IAC 2-1.1-5 (Non-attainment New Source Review)**

326 IAC 2-1.1-5 (Non-attainment New Source Review) is discussed in the "Potential to Emit After Issuance" section of this Technical Support Document.

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

Since the unrestricted potential to emit of this source is greater than two hundred fifty (250) tons of VOC per year, this source has elected to limit the potential to emit of this source as follows:

VOC emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 233.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, together with the uncontrolled potential to emit VOC from all other emission units at the source, shall limit VOC emissions from the entire source to less than 250 tons per year and will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the entire source.

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

None of the emission units were constructed after 1997; therefore, the requirements of 326 IAC 2-4.1 are not applicable to any of the existing emissions units.

**Hazardous Air Pollutants (HAP) Minor Limit**

Since the unrestricted potential to emit of this source is greater than 10 tons per year of a single HAP and greater than 25 tons per year of a combination of HAPs, this source has elected to limit the potential to emit of this source as follows:

- (a) The single Hazardous Air Pollutant (HAP) emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 8.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The combined Hazardous Air Pollutant (HAP) emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed 23.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, together with the uncontrolled potential to emit HAP from all other emission units at the source, shall limit single HAP emitted from the entire source to less than ten (10) tons per year and shall limit any combination of HAPs emitted from the entire source to less than twenty-five (25) tons per year. Compliance with this limit renders the source an "area source" of HAP emissions.

**326 IAC 6-2 (Particulate Emissions Limitations for Source of Indirect Heating)**

Pursuant to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows.

Table 6: 326 IAC 6-2 Evaluation							
Combustion Unit	Installation Date	Rating MMBtu/hr	Q MMBtu/hr	Pt lb/MMBtu (Q <10)	PM Emissions lb/hr ton/yr		Applicable Rule
Bryan Boiler	1996	0.45	116.965	0.32	36.96	161.91	326 IAC 6-2-4
16 Plastisol Line curing ovens	1986	83.2	116.515	0.32	36.86	161.44	326 IAC 6-2-4
18 space heaters	1986	3.06					
3 rapid air units	1986	8.685					
mix room heater	1986	0.6					
Plastisol Line 4114 burner	1986	0.12					
Cap Manufacturing curing ovens	1986	3.2					
Line 2805 curing oven	1986	6.0	11.65	0.87	10.11	44.29	326 IAC 6-2-3
Line 2701 curing oven	1970	4.0					
Line 2702 curing oven	1970	4.65					
Line 2803 curing oven	1970	3.0					
Cannister RTO	1970	6.0					

- (a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emission limit was calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input

- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise.
- h = Stack height in feet. = 9.5 ft
- Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
- N = Number of stacks. = 1

- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emission limit was calculated using the following equation:

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input  
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

### **326 IAC 6.5 (PM Limitations Except Lake County)**

Since the unrestricted potential to emit of this source is greater than ten (10) tons of particulate matter (PM) per year, this source has elected to limit the potential to emit of this source as follows:

PM emissions from the compound manufacturing operation shall not exceed 1.60 pounds per hour (lb/hr).

Compliance with the above limits, together with the uncontrolled potential to emit PM from all other emission units at the source, shall limit PM emissions from the entire source to less than ten (10) tons per year, and will render the requirements of 326 IAC 6.5 (PM Limitations Except Lake County) not applicable to this source.

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

- (a) Pursuant to 326 IAC 6-3-1(b)(6), the surface coating operations performed at this source are not subject to the requirements of 326 IAC 6-3-2 because they use the roller method of application and therefore do not generate particulate emissions.
- (b) The two (2) offset lithographic printing presses (on Lines 2803 and 2805) are not subject to the requirements of 326 IAC 6-3-2 because these presses do not generate particulate emissions.
- (c) The two (2) offset lithographic printing presses (on Lines 2803 and 2805) are not subject to the requirements of 326 IAC 6-3-2 because these presses do not generate particulate emissions.
- (d) Pursuant to 326 IAC 6-3-1(b)(14), the seven (7) scroll shears are not subject to the requirements of 326 IAC 6-3-2 because the particulate matter (PM) emissions are less than 0.551 pounds per hour (lb/hr).
- (e) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the compound manufacturing operation shall not exceed 3.63 pounds per hour when operating at a process weight rate of 0.83 tons per hour.

The pound per hour limitation in (e) was calculated with the following equation:

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

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

The baghouse for particulate control shall be in operation at all times the compound manufacturing operation is in operation, in order to comply with the limit in (e).

**326 IAC 8-1-2 (Miscellaneous Metal Coating)**

- (a) Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the roll coating operation on Line 2805 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

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

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).

The equivalent pounds of VOC per gallon of coating solids as applied (E) shall be limited to less than 2.90 pounds of VOC per gallon of coating solids (L is equal to 2.3 lb/gal and D is equal to 11.19 lb/gal).

- (b) 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.

Based on this equation and a coating with a VOC content of 39.34 pounds per gallon of coating solids, the Permittee shall operate the thermal oxidizer at an overall control efficiency of at least 91.67% (E is equal to 3.28 lb/gal coating solids for the coating with a VOC Content of 39.34 lb/gal coating solids).

**326 IAC 8-1-6 (New facilities; general reduction requirements)**

The metal roll coating Lines 2701, 2702 and 2803 are not subject to the requirements of 326 IAC 8-1-6 because they were constructed before the January 1, 1980 applicability date.

The metal roll coating Line 2805 is not subject to the requirements of 326 IAC 8-1-6 because it is subject to the requirements of 326 IAC 8-2-3 (Can Coating Operations).

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

Pursuant to 326 IAC 8-2-3, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of two and eight-tenths (2.8) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at the roll coating operation on Line 2805.

**326 IAC 8-2-5 (Paper Coating Operations)**

The source is not subject to 326 IAC 8-2-5 because the coating operations on Lines 2701, 2702, 2803 and 2805 do not operate web coating or saturation processes of paper, plastic, metal foil, or pressure sensitive tapes and labels.

**326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)**

Pursuant to 326 IAC 8-2-9(b)(1), the source is not subject to 326 IAC 8-2-9 because the coating operations on Lines 2701, 2702, 2803 and 2805 are limited by the requirements of 326 IAC 8-2-3 (Can Coating Operations).

**326 IAC 8-5-5 (Graphic Arts Operations)**

The two (2) offset lithographic printing presses (on Lines 2803 and 2805) are not subject to the requirements of 326 IAC 8-5-5 because they are not rotogravure or flexographic printing presses.

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

None of the roll coating operations or offset lithographic printing presses at the source are subject to the requirements of 326 IAC 8-6 because none of them commenced operation between October 7, 1974 and January 1, 1980.

<b>Compliance Determination and Monitoring Requirements</b>
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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.

**Compliance Determination Requirements**

The Compliance Determination Requirements applicable to this source are as follows:

- (1) The Cannister RTO shall be in operation whenever Lines 2701, 2702, 2803, or 2805 are in operation.
- (2) Compliance with the VOC emissions limitation 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.
- (3) The Permittee shall use the following methodology to calculate VOC emissions from the roll coating operations:

$$\text{VOC emissions} = \sum [ U_C \times C_{\text{VOC}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U$$

Where  $U_C$  = Coating usage, gal/month  
 $C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water  
DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_U$  = Uncontrolled VOC Emissions, lb/month

$$\text{VOC} \leq 233.00 \text{ tons/12 months}$$

- (4) The Permittee shall use the following methodology to calculate single and combined HAP emissions from the roll coating operations:

$$\text{HAP emissions} = \sum [ U_C \times C_{\text{VOC}} \times C_{\text{HAP}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U$$

Where  $U_C$  = Coating usage, gal/month  
 $C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water  
 $C_{\text{HAP}}$  = HAP Content, Weight %  
DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)  
CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration  
 $E_U$  = Uncontrolled HAP Emissions, lb/month

- (a) Single HAP  $\leq 9.95$  tons/12 months  
(b) Total HAP  $\leq 22.30$  tons/12 months
- (5) The Permittee shall conduct performance testing at least once every five (5) years from the date of the most recent valid compliance demonstration to verify VOC and HAP control efficiency (as the product of destruction efficiency and capture efficiency) for the Cannister RTO.
- (6) The Permittee shall perform PM testing of the baghouse controlling the compound manufacturing operation at least once every five (5) years from the date of the most recent valid compliance demonstration. [Minor Limit for 326 IAC 6.5]

$$\text{PM} \leq 1.60 \text{ lb/hr}$$

- (7) The baghouse for particulate control shall be in operation and controlling particulate, at all times when the compound manufacturing operation is in operation.

#### **Compliance Monitoring Requirements**

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

<b>Table 7: Summary of Compliance Monitoring Requirements</b>				
<b>Control Device</b>	<b>Parameter</b>	<b>Frequency</b>	<b>Range</b>	<b>Excursions and Exceedances</b>
Cannister RTO	3-hour average temperature	continuous	as determined by last valid compliance demonstration	Response steps
	duct pressure	Daily	-0.5 to -3.5 inches of water	

These monitoring conditions are necessary because the above listed control devices must operate properly to ensure compliance with the PSD Minor Limit for VOC pursuant to 326 IAC 2-2 (PSD), the HAP Minor Limit pursuant to 40 CFR 63 (NESHAP), 40 CFR 64 (CAM), and 326 IAC 2-7 (Part 70).

**Proposed Changes**

The changes listed below have been made to Part 70 Operating Permit Renewal No. T 163-17602-000003 Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

**Change No. 1** Condition A.1 id updated to remove the mailing address, to correct the general source phone number, and to update the source status. The source mailing address is also removed from all of the reporting forms. The changes are as follows:

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

The Permittee owns and operates a stationary metal closures fabrication plant.

Source Address:	2201 West Maryland Street, Evansville, Indiana 47712
<del>Mailing Address:</del>	<del>2201 West Maryland Street, Evansville, Indiana 47712</del>
General Source Phone Number:	(812) 467- <del>62219644</del>
SIC Code:	3499, 3466
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM <sub>2.5</sub> <del>and ozone under the 8-hour standard</del>
Source Status:	Attainment for all other criteria pollutants Part 70 <b>Operating</b> Permit Program Minor Source, under PSD <del>Major</del> <b>Minor</b> Source, under <del>Emissions Offset and Nonattainment NSR</del> <b>New Source Review</b> Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

**Change No. 2** Condition A.2 is updated as follows to include the description for the compound manufacturing operation:

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

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

(a) - (d) ...

- (e) **One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day, using fiberglass filters for particulate control.**

**Change No. 3** Condition A.3 is updated to change the rule applicability from 326 IAC 6.5-1-2 to 326 IAC 6-4, and to include the description for the scroll shearing operations. The changes are as follows:

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: one (1) Bryan boiler, constructed in 1996, with a maximum heat input capacity of 0.45 MMBtu/hr. ~~[326 IAC 6.5-1-2]~~**[326 IAC 6-2-4]**
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
- (1) Sixteen (16) Plastisol Line curing ovens, with maximum heat input capacities ranging from 0.45 to 5.2 MMBtu/hr ~~[326 IAC 6.5-1-2]~~**[326 IAC 6-2-4]**;
  - (2) Eighteen (18) space heaters, each with a maximum heat input capacity of 0.17 MMBtu/hr ~~[326 IAC 6.5-1-2]~~**[326 IAC 6-2-4]**;
  - (3) Three (3) rapid air units, each with a maximum heat input capacity of 7.435 MMBtu/hr, and one (1) rapid air unit with a maximum heat input capacity of 1.25 MMBtu/hr ~~[326 IAC 6.5-1-2]~~**[326 IAC 6-2-4]**;
  - (4) One (1) mix room heater, with a maximum heat input capacity of 0.60 MMBtu/hr ~~[326 IAC 6.5-1-2]~~**[326 IAC 6-2-4]**;
  - (5) One (1) Plastisol Line 4114 burner, with a maximum heat input capacity of 0.12 MMBtu/hr ~~[326 IAC 6.5-1-2]~~**[326 IAC 6-2-4]**; and
  - (6) Four (4) cap manufacturing curing ovens (Press Lines), each with a maximum heat capacity of 0.8 MMBtu/hr. ~~[326 IAC 6.5-1-2]~~**[326 IAC 6-2-4]**
- (c) **Seven (7) scroll shears, constructed in 1970, each with a line speed of 24 metal sheets per minute.**

**Change No. 4** Condition B.2 is updated for clarity as follows:

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

- (a) This permit, T163-4760**230180**-00003, 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) ...

**Change No. 5** Condition B.3 is updated for clarity as follows:

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

---

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

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

**Change No. 6** The title for Condition B.4 is updated to include an applicable rule citation as follows:

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

---

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

**Change No. 7** Condition B.7 is updated for clarity as follows:

**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 ~~Part~~ 2, Subpart B.

**Change No. 8** Condition B.8 is updated for clarity as follows:

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

---

- (a) ~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance~~ **A certification submitted shall contain required by this permit meets the requirements of 326 IAC 2-7-6(1) if:**
  - (1) **it contains a certification by a "responsible official of truth, accuracy," as defined by 326 IAC 2-7-1(34), and completeness.** ~~This~~
  - (2) **the certification shall state** ~~states~~ **states** 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 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. 9** Condition B.9 is updated to update the IDEM address and to clarify certification requirements. The changes are as follows:

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

---

(a) ...

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

and

...

(b) ...

(c) ...

(1) - (5) ...

The submittal 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. 10** Condition B.10 is updated to clarify the intent of the Preventive Maintenance Plan requirements as follows:

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

---

(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 **prepare and 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) - (3) ...

**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).**

(ed) ...

**Change No. 11** The IDEM contact information for Condition B.11 is updated, the certification requirement of this condition is clarified, and the requirement to include all emergencies in the Quarterly Deviation and Compliance Monitoring Report is removed. The changes are as follows:

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

---

(a) ...

(b) ...

(1) - (3) ...

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, **or Southwest Regional Office** within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for **Office of Air Quality, Compliance Section**) **and Enforcement Branch**)

Facsimile Number: 317-233-6865

**Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.**

(5) ...

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

...

(A) - (C) ...

The notification which shall be submitted by the Permittee does not require thea 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).

(6) ...

(c) - (g) ...

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

**Change No. 12** Condition B.13 is updated as follows:

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

(a) All terms and conditions of permits established prior to T163-4760230180-00003, and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) - (3) ...

(b) Provided that all terms and conditions are accurately reflected in this ~~combined~~ permit, all previous registrations and permits are superseded by this **Part 70 operating** permit.

**Change No. 13** Condition B.15 is removed. These requirements are now included in Section C of the permit under General Reporting Requirements.

~~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 Data Section, 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. 14** Condition B.16 (now B.15) is updated as follows:

~~B.16~~**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]

---

- (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 ~~permit~~**Operating Permit** modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require ~~the~~ certification **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) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ ~~determines~~**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) - (d) ...

**Change No. 15** Condition B.17 (now B.16) is updated as follows for clarity:

~~B.17~~**B.16** Permit Renewal **[326 IAC 2-7-3]** [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

---

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

Request for renewal shall be submitted to:

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

(b) ...

- (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. 16** Condition B.18 (now B.17) is updated as follows for clarity:

~~B.17~~**B.17** Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

---

- (a) ...
- (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**~~Permits Branch~~, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application ~~shall be certified by~~ **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) ...

**Change No. 17** Condition B.19 (now B.18) is updated as follows for clarity:

~~B.18~~**B.18** Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12(b)(2)]

---

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

**Change No. 18** Condition B.20 (now B.19) is updated as follows for clarity:

~~B.19~~**B.19** Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) - (3) ...
- (4) The Permittee notifies the:
- Indiana Department of Environmental Management  
**Permit Administration and Support Section**~~Permits Branch~~, Office of Air Quality  
Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- and
- ...

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document, all such changes and ~~emission~~**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.

...

- (b) ...

(1) - (4) ...

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require ~~the~~ certification **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) Emission Trades [326 IAC 2-7-20(c)]

...

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

...

- (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.**

**Change No. 19** Condition B.21 (now B.20) is updated as follows for clarity:

**B.2120** Source Modification Requirement [326 IAC 2-7-10.5]~~[326 IAC 2-2-2]~~~~[326 IAC 2-3-2]~~

- ~~(a)~~ A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2-~~and 326 IAC 2-7-10.5.~~

- ~~(b)~~ Any modification at an existing major source is governed by the requirement of 326 IAC 2-2-2 and 326 IAC 2-3-2.

**Change No. 20** Condition B.22 (now B.21) is updated as follows for clarity:

**B.2221** Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

- (a) - (e) ...

**Change No. 21** Condition B.23 (now B.22) is updated as follows for clarity:

**B.2322** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) ...

- (b) ...

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

~~The~~**Any such** application ~~which shall be submitted by the Permittee~~ does require ~~the~~ certification ~~by the~~**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) ...

**Change No. 22** Condition B.24 (now B.23) is updated as follows for clarity:

**B.2423** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

---

- (a) The Permittee shall pay annual fees to IDEM, **OAQ** within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, **OAQ**, the applicable fee is due April 1 of each year.
- (b) ...
- (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.

**Change No. 23** The title of Condition C.1 is updated as follows:

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

---

...

**Change No. 24** Condition C.2 is updated as follows for clarity:

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) ...
- (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 ~~non-overlapping~~**nonoverlapping** integrated averages for a continuous opacity monitor) in a six (6) hour period.

**Change No. 25** Condition C.4 is updated as follows for clarity:

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~~ **in this permit. 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. 26** Condition C.5 is updated as follows for clarity:

**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.**

**Change No. 27** Condition C.6 is updated as follows for clarity:

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

---

(a) - (c) ...

(d) ...

All required notifications shall be submitted to:

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

and

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

(e) Procedures for Asbestos Emission Control

...

(f) Demolition and ~~renovation~~**Renovation**

...

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

**Change No. 28** Condition C.7 is updated as follows for clarity:

**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) For performance testing required by this permit, a A test protocol, except as provided elsewhere in this permit, shall be submitted to:**

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

and

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

- (c) ...

**Change No. 29** Condition C.9 is updated as follows for clarity:

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

Unless otherwise specified in this permit, **for all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required** **allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such** monitoring related to that equipment. If due to circumstances beyond ~~its~~ **the Permittee's** control, ~~that~~ **any monitoring equipment required by this permit** cannot be installed and operated ~~within~~ **no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later**, 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

...

The notification which shall be 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. 30** Condition C.10 is removed as these requirements are already covered elsewhere in this permit.

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

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

**Change No. 31** Condition C.12 (now C.11) is updated as follows for clarity:

**C.1211** Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee ~~prepared and~~ **shall maintain the most recently** submitted written emergency reduction plans (ERPs) consistent with safe operating procedures ~~on January 5, 2004.~~
- (b) ...

**Change No. 32** Condition C.14 (now C.13) is updated as follows for clarity:

**C.1413** Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

~~(a) Upon detecting an excursion where a response step is required by the D Section or an exceedance, the 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 **excess** 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 **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 ~~within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~ **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 ~~maintain~~ **record** the following records:
  - ~~(1) monitoring data;~~
  - ~~(2) monitor performance data, if applicable; and~~

~~(3)~~ — ~~corrective actions~~ **reasonable response steps** taken.

**Change No. 33** Condition C.15 (now C.14) is updated as follows for clarity:

C.1514 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall submit a description of these its response actions to IDEM, OAQ, within thirty (30) days of receipt~~ **no later than seventy-five (75) days after the date** of the test results. ~~The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~
- (b) A retest to demonstrate compliance shall be performed ~~within~~ **no later than** one hundred ~~twenty (120) days of receipt of~~ **eighty (80) days after the original date of the test results.** Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline-~~ **eighty (80) 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. 34** Condition C.16 (now C.15) is updated for clarity and to remove the statement regarding timeliness of the emission statement. The changes are as follows:

C.1615 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)~~ — ...

(1) - (2) ...

...

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. 35** Condition C.17 (now C.16) is updated for clarity and to remove the requiremetns that pertain to PSD as the source is no longer considered a major source under the PSD rules. The changes are as follows:

C.1716 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] ~~[326 IAC 2-2] [326 IAC 2-3]~~

(a) ...

- (b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, **the Permittee shall be implemented within 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) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1(gg) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:~~
- ~~(1) Prior to commencing the construction of the "project" (as defined in 326 IAC 2-2-1(gg) and/or 326 IAC 2-3-1 (II)) at an existing emissions unit, document and maintain the following records:~~
- ~~(A) A description of the project.~~
- ~~(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.~~
- ~~(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:~~
- ~~(i) Baseline actual emissions;~~
- ~~(ii) Projected actual emissions;~~
- ~~(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and~~
- ~~(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.~~
- ~~(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and~~
- ~~(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.~~

**Change No. 36** Condition C.18 (now C.17) is updated for clarity, to insert the reporting requirements pertaining to deviations, and to remove the requirements that pertain to PSD as the source is no longer considered a major source under the PSD rules. The changes are as follows:

**C.18.17** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]~~[326 IAC 2-2]~~[326 IAC 2-3]

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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 ~~with~~**not later than** thirty (30) days ~~of~~**after** 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 required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted ~~to~~**submittal is:**
- Indiana Department of Environmental Management  
Compliance ~~Data Section~~**and Enforcement Branch**, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) ...
- ~~(d)~~ Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports ~~do~~ require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- ~~(e)~~**(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.
- ~~(f)~~ If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C—General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1(gg) and/or 326 IAC 2-3-1 (ll)) at an existing emissions, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C—General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C—General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C—General Record Keeping Requirements (c)(1)(C)(ii).

- ~~(g) — The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:~~
- ~~(1) — The name, address, and telephone number of the major stationary source.~~
  - ~~(2) — The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.~~
  - ~~(3) — The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).~~
  - ~~(4) — Any other information that the Permittee deems fit to include in this report,~~

~~Reports required in this part shall be submitted to:~~

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

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

**Change No. 37** Condition C.19 (now C.18) is updated as follows for clarity:

**C.1918** Compliance with 40 CFR 82 and 326 IAC 22-1

---

Pursuant to 40 CFR ~~Part~~ 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with ~~the~~**applicable** 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. 38** The title of Section D.1 is updated as follows:

SECTION D.1                      ~~FACILITY~~**EMISSION UNIT** OPERATION CONDITIONS

**Change No. 39** The PSD Minor Limit in Condition D.1.1 is updated as follows:

D.1.1 Prevention of Significant Deterioration (PSD) Minor Source Limit [326 IAC 2-2]

---

Pursuant to T163-6913-00003, issued January 19, 1999 and revised through the Part 70 renewal, the Permittee shall comply with the following requirements:

- ~~(a) — input of VOC to~~**emissions from** the four (4) roll coating operations, including cleanup solvents, shall not exceed ~~4,560~~**233.00** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

~~(b) — The thermal oxidizer shall maintain a minimal overall control efficiency of 85%. These limits are equivalent to 234 tons per year of VOC emissions from the four (4) roll coating operations. The potential VOC emissions from all other operations are fifteen (15) tons per year. Therefore, compliance with the VOC input limit given in Condition D.1.1(a)~~  
**Compliance with the above limits** in addition to PTE of the two (2) lithographic printing presses and insignificant activities is equivalent to VOC emissions from the entire source of less than 250 tons per year and will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the ~~1986 construction of coating Line 2805.~~ **entire source.**

**Change No. 40** The VOC Limitations in Condition D.1.2 are updated as follows:

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-3] [326 IAC 8-1-2]

---

(a) ...

(b) ...

...

The equivalent pounds of VOC per gallon of coating solids as applied (E) shall be limited to less than ~~4.52~~**2.90** pounds of VOC per gallon of coating solids (L is equal to ~~2.83~~**1.19 lb/gal** and D is equal to ~~7.36~~**1.19 lb/gal**).

(c) ...

...

**Based on this equation and a clear coating with a VOC content of ~~22.2~~39.34 pounds per gallon of coating solids, the Permittee shall operate the thermal oxidizer at an overall control efficiency of at least ~~79.6%~~91.67%** (E is equal to 3.28 lb/gal coating solids for the coating with a VOC Content of 39.34 lb/gal coating solids).

**Change No. 41** The HAP Limitations in Condition D.1.3 are updated as follows:

D.1.3 Hazardous Air Pollutants (HAP) Limitations [40 CFR 63, ~~Subpart KKKK~~] [40 CFR 63, ~~Subpart DDDDD~~] [40 CFR 63, ~~Subpart MMMM~~]

---

(a) The single Hazardous Air Pollutant (HAP) emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed ~~eight and eight tenths (8.8)~~**9.95** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~Compliance with this limit renders the requirements of 40 CFR 63, Subpart KKKK, Subpart MMMM, and Subpart DDDDD not applicable.~~

(b) The combined Hazardous Air Pollutant (HAP) emissions from the four (4) roll coating operations, including cleanup solvents, shall not exceed ~~twenty three and eight tenths (23.8)~~**22.30** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~Compliance with this limit renders the requirements of 40 CFR 63, Subpart KKKK, Subpart MMMM, and Subpart DDDDD not applicable.~~

~~(c) The thermal oxidizer shall maintain a minimal overall HAP control efficiency of 89%. The Compliance with the above limits, together with the uncontrolled potential to emit HAP emissions from all other operations are one and two-tenths (1.2) tons per year. Therefore, compliance with the HAP emission limits given in Conditions D.1.3(a) and D.1.3(b), in addition to the PTE of the natural gas combustion operations and insignificant UV printing line is equivalent to any units at the source, shall limit single HAP emitted from the entire source is to less than ten (10) tons per year and shall limit any combination of HAPs emitted from the entire source is to less than twenty-five (25) tons per year. Compliance with this limit renders the source an "area source" of HAP emissions.~~

**Change No. 42** The PM Limitations in Condition D.1.4 (now D.1.4 and D.1.5) are updated to reflect a change in rule applicability. 326 IAC 6-2-3 and 326 IAC 6-2-4 apply to the metal coating lines now instead of 326 IAC 6.5-1-2 because PM emissions are limited to less than 10 tons per year source-wide. The changes are as follows:

~~D.1.4 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]~~

~~Pursuant to 326 IAC 6.5-1-2(a), the allowable particulate emissions for each of the four (4) metal coating lines identified as 2701, 2702, 2803 and 2805 shall not exceed 0.03 grains per dry standard cubic foot of air per minute.~~

**D.1.4 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]**

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows.

Combustion Unit	Q MMBtu/hr	Pt lb/MMBtu (Q <10)
Line 2701 curing oven	11.65	0.87
Line 2702 curing oven		
Line 2803 curing oven		

The PM emission limit was calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

- where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise.
- h = Stack height in feet.
- Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
- N = Number of stacks.

**D.1.5 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows.

Combustion Unit	Q MMBtu/hr	Pt lb/MMBtu (Q <10)
Line 2805 curing oven	116.515	0.32

The PM emission limits were calculated using the following equation:

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input  
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

**Change No. 43** Condition D.1.5 (now D.1.6) is updated as follows for clarity:

**D.1.5D.1.6** 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 four (4) roll coating operations (on Lines 2701, 2702, 2803 and 2805), and the Cannister RTO thermal oxidizer. **Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.**

**Change No. 44** Condition D.1.6 (now D.1.7) is updated as follows for clarity:

**D.1.67** Thermal Oxidizer Operation

In order to ~~comply~~ **ensure compliance** with Conditions D.1.1, D.1.2, and D.1.3, the Cannister RTO shall be in operation whenever Lines 2701, 2702, 2803, or 2805 are in operation.

**Change No. 45** Condition D.1.7 (now D.1.8) is updated as follows for clarity:

**D.1.78** Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC and HAPs usage and content limitations contained in Conditions D.1.1(a), D.1.2(a), 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, and the City of Evansville EPA reserve **reserves** the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Change No. 46** New Condition D.1.9 is added as follows to specify how Silgan will calculate VOC emissions for compliance demonstrations:

**D.1.9** Volatile Organic Compounds (VOC)

In order to ensure compliance with the VOC emission limitations in Condition D.1.1, the Permittee shall use the following methodology to calculate VOC emissions:

$$\text{VOC emissions} = \sum [ U_C \times C_{\text{VOC}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U$$

Where  $U_C$  = Coating usage, gal/month

$C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water

DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)

CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration

$E_U$  = Uncontrolled VOC Emissions, lb/month

**Change No. 47** Condition D.1.8 (now D.1.10) is updated as follows to update the equation Silgan will use to calculate HAP emissions for compliance demonstrations:

**D.1.8D.1.10 Hazardous Air Pollutants (HAPs)**

---

~~In order to determine compliance with the HAP emission limitations in Condition D.1.3, the Permittee shall use the following methodology to calculate single and combined HAP emissions:~~

~~HAP emission = HAP usage x [1.0 - (Destruction Efficiency determined at the latest stack test using Method 18) x (Capture Efficiency determined at the latest stack test)]~~

~~Until the initial Method 18 stack testing is performed, an overall control efficiency of 89% shall be used to determine compliance with the HAP emission limitations.~~

**In order to ensure compliance with the HAP emission limitations in Condition D.1.3, the Permittee shall use the following methodology to calculate single and combined HAP emissions:**

$$\text{HAP emissions} = \sum [ U_C \times C_{\text{VOC}} \times C_{\text{HAP}} ] \times (1.0 - \text{DE}) \times \text{CE} / 2000 \text{ lb/ton} + E_U$$

**Where**  $U_C$  = Coating usage, gal/month

$C_{\text{VOC}}$  = VOC Content, lb/gal coating, less water

$C_{\text{HAP}}$  = HAP Content, Weight %

DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration (using Method 18, or equivalent)

CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration

$E_U$  = Uncontrolled HAP Emissions, lb/month

**Change No. 48** Condition D.1.9 (now D.1.10) is updated as follows for clarity:

**D.1.911 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

---

- (a) In order to demonstrate **the compliance status** with Conditions D.1.1 and D.1.2, ~~within 180 days of the issuance of this permit, the~~ **the** Permittee shall conduct a **performance test inlet and outlet VOC emissions testing** to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) for the Cannister RTO ~~utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.~~
- (b) In order to demonstrate **the compliance status** with Condition D.1.3, the Permittee shall perform ~~inlet and outlet~~ **HAP emissions testing at the outlet** of the Cannister RTO, ~~utilizing Method 18 or other methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.~~

**Testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration utilizing methods as approved by the Commissioner. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.**

**Change No. 49** Condition D.1.10 (now D.1.12) is updated as follows for clarity:

~~D.1.10~~ **D.1.12** Thermal Oxidizer Temperature [40 CFR Part 64]

---

~~To demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3:~~

- ~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the Cannister RTO for measuring operating temperature. For the purposes of this condition, continuous shall mean no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1450°F. A 3-hour average temperature that is below 1450°F is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.~~
- ~~(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1, D.1.2, and D.1.3 as approved by IDEM, OAQ.~~
- ~~(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the 3-hour average temperature of the Cannister RTO is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

**In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, a continuous monitoring system shall be calibrated, maintained, and operated on the Cannister RTO for measuring operating temperature. For the purposes of this condition, continuous shall mean no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps whenever the 3-hour average temperature of the thermal oxidizer is below the temperature for the most recent valid compliance demonstration. A 3-hour average temperature that is below temperature for the most recent valid compliance demonstration is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.**

**Change No. 50** Condition D.1.11 (now D.1.13) is updated as follows for clarity:

~~D.1.11~~ **D.1.13** Parametric Monitoring

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- ~~(a) The Permittee shall determine fan amperage or duct pressure from~~ **In order to demonstrate the most recent valid stack test that demonstrates compliance status with limits in Conditions D.1.1, D.1.2, and D.1.3 as approved by IDEM, OAQ.:**

~~(ba)~~ The **Permittee shall record the** duct pressure ~~or fan amperage shall be observed~~**associated with operation of the thermal oxidizer** at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure ~~or fan amperage~~ is outside the normal range ~~as of -0.5 to -3.5 inches of water, or the duct pressure~~ established ~~in~~**by** most recent ~~compliant stack test~~**valid compliance demonstration**, the Permittee shall take reasonable response steps in accordance with ~~Section C - Response to Excursions or Exceedances~~. **A duct pressure** reading that is outside the **above mentioned** range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with ~~Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit. **Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.**

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

**Change No. 51** Condition D.1.12 is removed because there is adequate monitoring in place for these operations and visible emissions notations will not have any added benefit.

#### D.1.12 Visible Emissions Notations

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

**Change No. 52** Condition D.1.13 (now D.1.14) is updated as follows for clarity:

#### D.1.14 Record Keeping Requirements

- (a) To document **the compliance status** with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(64)~~ below. Records maintained for (1) through ~~(64)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used less water on monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) ~~The volume weighted VOC content of the coatings used for each month;~~
- ~~(4) The cleanup solvent usage for each month; and~~
- ~~(54) The total VOC usage for each month; and~~
- ~~(6) The weight of VOCs emitted for each compliance period.~~
- (b) To document **the compliance status** with the single and combined HAP limits in Condition D.1.3, the Permittee shall be required to maintain records in accordance with (1) through (43) below. Records maintained for (1) through (43) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established for this source.
  - (1) The amount and HAP content of each coating material and solvent used. Records shall include inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used.
  - ~~(2) A log of the dates of use.~~
  - (2) The single and combined HAP usage for each month.**
  - ~~(3) The single and combined HAP usage for each month.~~
  - ~~(4) The single and combined HAP emissions for each month, using the methodology in Condition D.1.89.~~
- (c) To document **the compliance status** with Condition D.1.4012, the Permittee shall maintain continuous records (on a three-hour average) of thermal oxidizer temperature.
- (d) To document **the compliance status** with Condition D.1.4413, the Permittee shall maintain daily records of duct pressure ~~or fan amperage.~~
- ~~(e) In order to document compliance with Condition D.1.12, the~~ **The Permittee shall maintain records of include in its daily visible emission notations of record when a duct pressure reading is not taken and the RTO Cannister stack exhaust reason for the lack of a reading (e.g. the process did not operate that day).**
- ~~(f) All records shall be maintained in accordance with (e)~~ **Section C - General Record Keeping Requirements, of contains the Permittee's obligations with regard to the record keeping required by this permit condition.**

**Change No. 53** Condition D.1.14 (now D.1.15) is updated as follows for clarity:

**D.1.1415 Reporting Requirements**

A quarterly summary of the information to document **the compliance status** with Conditions D.1.1 and D.1.3 shall be submitted ~~to the addresses 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 no later than thirty (30) days after~~**following** the end of ~~the~~**each** quarter ~~being reported.~~ The report submitted by the Permittee does require ~~the~~ certification ~~by the~~**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 C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.**

**Change No. 54** New Section D.2 is added to include the requirements that apply to the compound manufacturing operation.

**SECTION D.2 EMISSION UNIT OPERATION CONDITIONS**

**Emission Unit Description [326 IAC 2-7-5(15)]:**

- (e) One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day, and a minimum batch time of 30 minutes, using fiberglass filters for particulate control.**

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

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

**D.2.1 PM Limitations [326 IAC 6.5]**

**PM emissions from the compound manufacturing operation shall not exceed 1.60 pounds per hour (lb/hr).**

**Compliance with the above limit, together with the uncontrolled potential to emit PM from all other emission units at the source, shall limit PM emissions from the entire source to less than ten (10) tons per year, and will render the requirements of 326 IAC 6.5 (PM Limitations Except Lake County) not applicable to this source.**

**D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

**Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the compound manufacturing operation shall not exceed 3.63 pounds per hour when operating at a process weight rate of 0.83 tons per hour. The pound per hour limitation was calculated with the following equation:**

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

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

**D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

**A Preventive Maintenance Plan is required for the compound manufacturing operation and the fiberglass filters. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to preventive maintenance plans.**

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

**D.2.4 Testing Requirements [326 IAC 2-1.1-11]**

In order to demonstrate the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall perform testing of the PM emissions from the compound manufacturing operation, when plastisol is being added to the process, within one hundred eighty (180) days of issuance of T163-30180-00003. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) 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 required by this condition.

**D.2.5 Particulate Control [326 IAC 2-7-6(6)]**

The fiberglass filters for particulate control shall be in operation and controlling particulate, at all times when plastisol is being added to the compound manufacturing operation.

**Change No. 55** Section D.2 is now D.3. The PM Limitations in Condition D.2.1 (now D.3.1) are updated to reflect a change in rule applicability. 326 IAC 6-2-4 applies now instead of 326 IAC 6.5-1-2 because PM emissions are limited to less than 10 tons per year source-wide. The changes are as follows:

**SECTION ~~D.2~~-D.3 FACILITYEMISSION UNIT OPERATION CONDITIONS**

~~D.2.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]~~

- ~~(a) Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) emissions from the insignificant activities described in this Section D.2(b) shall be limited to 0.03 grain/dry standard cubic foot.~~
- ~~(b) Pursuant to 326 IAC 6-1-2(b)(3), the particulate matter (PM) content of all gaseous fuel fired steam generators (insignificant Bryan boiler) shall not exceed 0.01 grains per dry standard cubic foot.~~

**D.3.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows.

Combustion Unit	Q MMBtu/hr	Pt lb/MMBtu (Q <10)
Bryan Boiler	116.965	0.32
16 Plastisol Line curing ovens	116.515	0.32
18 indirect space heaters		
3 rapid air units		
mix room indirect heater		
Plastisol Line 4114 burner		
Cap Manufacturing curing ovens		

The PM emission limits were calculated using the following equation:

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

where: **Pt** = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input  
**Q** = Total source maximum operating capacity rating in MMBtu/hr heat input.

**Change No. 56** The Emergency Occurrence Report has been updated as follows:

### EMERGENCY OCCURRENCE REPORT

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), **within no later than four (4) daytime business hours** (1-800-451-6027 or 317-233-0178, ask for Compliance ~~Section~~ **and Enforcement Branch**); and
  - The Permittee must submit notice in writing or by facsimile **within no later than two (2) working days** (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

~~A certification is not required for this report.~~

**Change No. 57** The Quarterly Reports have been updated as follows:

### QUARTERLY REPORT

~~Attach a signed certification to complete this report.~~

**Change No. 58** The Quarterly Deviation and Compliance Monitoring Report has been updated as follows:

### QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

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".

~~Attach a signed certification to complete this report.~~

### Recommendation

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

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

An application for the purposes of this review was received on February 3, 2011.

**Conclusion**

The operation of this stationary metal closures fabrication plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T163-30180-00003.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Kimberly Cottrell 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) 233-0870 or toll free at 1-800-451-6027 extension 3-0870.
- (b) A copy of the findings 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)



Roll Coating Lines - 2701, 2702, 2803, & 2805

Material ID	Coating Usage *As Applied					Coating Line				Coating Density lb/gal	Weight % Volatiles %	Weight % Water %	Weight % VOC %	Volume % Solids %	VOC Content lb VOC / gal coating less water	VOC Content lb VOC / gal coating solids	Solids Content lb solids / gal coating	Unrestricted VOC Emissions ton/yr	326 IAC 8-2- 9 Limit lb VOC / gal coating less water	Equiv. 326 IAC 8-1-2(b) lb VOC / gal solids	Overall Efficiency [326 IAC 8-1- 2(c)] %
	mg / 4 sq-in	mg/sheet	lb/sheet	gal/sheet	gal/hr	"2701"	"2702"	"2803"	"2805"												
B.11.7	15	5,181	1.1E-02	1.2E-03	6.09	X	X	X		9.56	48.04%	0%	48.04%	38.59%	4.59	11.90	4.97	122.58	2.3	3.03	74.55%
B.23.5	20	6,908	1.5E-02	1.8E-03	9.23	X	X			8.42	69.95%	0%	69.95%	21.40%	5.89	27.52	2.53	237.98	2.3	3.16	88.50%
B.24.3	25	8,636	1.9E-02	2.1E-03	10.79	X	X	X	X	9.00	62.14%	0%	62.14%	24.43%	5.59	22.89	3.41	264.27	2.3	3.09	86.50%
B.24.5	30	10,363	2.3E-02	2.5E-03	12.92	X	X	X	X	9.02	61.66%	0%	61.66%	24.80%	5.56	22.43	3.46	314.67	2.3	3.09	86.23%
B.24.7	35	12,090	2.7E-02	2.9E-03	15.04	X	X	X	X	9.04	61.30%	0%	61.30%	25.08%	5.54	22.10	3.50	364.97	2.3	3.08	86.04%
B.24.9	40	13,817	3.0E-02	3.4E-03	17.17	X	X			9.05	61.02%	0%	61.02%	25.30%	5.52	21.83	3.53	415.20	2.3	3.08	85.87%
B.28.5	35	12,090	2.7E-02	2.8E-03	14.03	X	X	X	X	9.69	47.64%	0%	47.64%	39.11%	4.62	11.80	5.07	283.64	2.3	3.02	74.45%
B.29.5	25	8,636	1.9E-02	2.0E-03	10.09	X	X			9.62	51.07%	0%	51.07%	35.71%	4.91	13.76	4.71	217.19	2.3	3.02	76.03%
E.33.5	12	4,145	9.1E-03	1.1E-03	5.65	X		X		8.25	74.20%	0%	74.20%	18.96%	6.12	32.29	2.13	151.47	2.3	3.19	90.12%
E.82.5	11	3,800	8.4E-03	9.9E-04	5.06		X	X	X	8.45	52.40%	0%	52.40%	40.90%	4.43	10.83	4.02	98.05	2.3	3.16	70.81%
G.27.1	6	2,073	4.6E-03	5.8E-04	2.93	X	X			7.94	72.62%	0%	72.62%	21.78%	5.77	26.47	2.17	74.12	2.3	3.24	87.77%
G.27.4	9	3,109	6.9E-03	8.6E-04	4.38	X	X			7.98	70.45%	0%	70.45%	23.62%	5.62	23.80	2.36	107.86	2.3	3.23	86.42%
G.27.7	12	4,145	9.1E-03	1.1E-03	5.83	X	X			8.00	69.24%	0%	69.24%	24.66%	5.54	22.47	2.46	141.34	2.3	3.23	85.63%
G.27.9	15	5,181	1.1E-02	1.4E-03	7.26	X	X			8.02	68.57%	0%	68.57%	25.23%	5.50	21.80	2.52	174.97	2.3	3.22	85.21%
G.70.3	10	3,454	7.6E-03	9.5E-04	4.87		X	X	X	7.98	70.52%	0%	70.52%	23.49%	5.63	23.96	2.35	119.96	2.3	3.23	86.51%
G.70.5	12	4,145	9.1E-03	1.1E-03	5.83			X		8.00	69.79%	0%	69.79%	24.10%	5.58	23.17	2.42	142.46	2.3	3.23	86.07%
G.70.7	15	5,181	1.1E-02	1.4E-03	7.27		X	X	X	8.01	69.04%	0%	69.04%	24.74%	5.53	22.35	2.48	176.17	2.3	3.23	85.57%
G.122.9	15	5,181	1.1E-02	1.4E-03	7.30			X		7.98	68.95%	0%	68.95%	25.28%	5.50	21.77	2.48	175.94	2.3	3.23	85.15%
G.126.5	10	3,454	7.6E-03	9.7E-04	4.95	X				7.85	71.27%	0%	71.27%	23.29%	5.59	24.02	2.26	121.24	2.3	3.25	86.46%
K.A.1.5	47	16,235	3.6E-02	3.2E-03	16.49	X				11.07	41.58%	0%	41.58%	40.12%	4.80	11.47	6.47	332.44	2.3	2.90	74.70%
K.B.5.7	27	9,326	2.1E-02	2.3E-03	11.96	X	X			8.77	57.12%	0%	57.12%	34.36%	5.01	14.58	3.76	262.35	2.3	3.12	76.62%
K.C.7.5	43	14,853	3.3E-02	3.0E-03	15.24	X	X			10.96	42.27%	0%	42.27%	39.64%	4.63	11.69	6.33	309.19	2.3	2.91	75.09%
K.L.2.3	34	11,744	2.6E-02	2.4E-03	12.13	X	X			10.89	43.22%	0%	43.22%	38.63%	4.71	12.18	6.18	249.97	2.3	2.92	76.07%
K.L.3.5	40	13,817	3.0E-02	2.8E-03	14.34	X	X			10.83	43.08%	0%	43.08%	39.31%	4.67	11.87	6.16	293.13	2.3	2.92	75.40%
K.T.2.5	35	12,090	2.7E-02	2.4E-03	12.49	X	X			10.88	43.01%	0%	43.01%	38.83%	4.68	12.05	6.20	256.07	2.3	2.92	75.80%
K.W.36.5	38	13,126	2.9E-02	2.6E-03	13.19	X	X			11.19	41.63%	0%	41.63%	39.66%	4.66	11.75	6.53	269.10	2.3	2.90	75.35%
K.Y.41.3	25	8,636	1.9E-02	2.2E-03	11.13	X	X			8.72	59.56%	0%	59.56%	31.13%	5.19	16.68	3.53	253.29	2.3	3.12	81.28%
K.Y.41.5	35	12,090	2.7E-02	3.0E-03	15.54	X	X			8.75	58.57%	0%	58.57%	32.01%	5.12	16.01	3.63	348.72	2.3	3.12	80.51%
K.Y.50.5	38	13,126	2.9E-02	3.1E-03	15.80	X	X			9.34	52.31%	0%	52.31%	36.17%	4.89	13.51	4.45	338.14	2.3	3.05	77.41%

Roll Coating Lines - 2701, 2702, 2803, & 2805

Material ID	Coating Usage *As Applied					Coating Line				Coating Density lb/gal	Weight % Volatiles %	Weight % Water %	Weight % VOC %	Volume % Solids %	VOC Content lb VOC / gal coating less water	VOC Content lb VOC / gal coating solids	Solids Content lb solids / gal coating	Unrestricted VOC Emissions ton/yr	326 IAC 8-2 3 Limit lb VOC / gal coating less water	Equiv. 326 IAC 8-1-2(b) lb VOC / gal solids	Overall Efficiency [326 IAC 8-1- 2(c)] %
	mg/ 4 sq-in	mg/sheet	lb/sheet	gal/sheet	gal/hr	*2701*	*2702*	*2803*	*2805*												
O.93.4	9	3.109	6.9E-03	8.6E-04	4.39			X	X	7.97	74.16%	0%	74.16%	21.41%	5.91	27.61	2.06	113.54	2.3	3.23	88.29%
O.93.5	11	3.800	8.4E-03	1.0E-03	5.35	X	X	X	X	7.99	73.45%	0%	73.45%	22.03%	5.87	26.64	2.12	137.44	2.3	3.23	87.88%
O.130.3	7	2.418	5.3E-03	6.7E-04	3.44			X		7.90	75.00%	0%	75.00%	20.72%	5.93	28.60	1.98	89.31	2.3	3.24	88.65%
O.135.5	10	3.454	7.6E-03	9.4E-04	4.79			X	X	8.10	61.38%	0%	61.38%	32.95%	4.97	15.09	3.13	104.41	2.3	3.21	78.71%
O.136.5	11	3.800	8.4E-03	1.0E-03	5.35			X		7.99	72.95%	0%	72.95%	22.47%	5.83	25.94	2.16	136.50	2.3	3.23	87.55%
O.141.1	8	2.763	6.1E-03	7.6E-04	3.89	X	X	X	X	7.98	73.45%	0%	73.45%	21.88%	5.86	26.79	2.12	99.96	2.3	3.23	87.94%
O.141.3	10	3.454	7.6E-03	9.5E-04	4.86			X		7.99	72.51%	0%	72.51%	22.71%	5.79	25.51	2.20	123.35	2.3	3.23	87.34%
O.141.5	11	3.800	8.4E-03	1.0E-03	5.34			X		8.00	72.16%	0%	72.16%	23.02%	5.77	25.08	2.23	135.03	2.3	3.23	87.13%
O.162.5	11	3.800	8.4E-03	1.0E-03	5.24			X	X	8.16	59.84%	0%	59.84%	34.11%	4.88	14.32	3.28	111.97	2.3	3.20	77.63%
O.164.5	11	3.800	8.4E-03	1.0E-03	5.15	X	X	X	X	8.29	61.95%	0%	61.95%	31.43%	5.14	16.34	3.15	115.92	2.3	3.18	80.52%
S.C.12.3	10	3.454	7.6E-03	9.6E-04	4.89	X	X	X	X	7.95	70.39%	0%	70.39%	24.04%	5.60	23.28	2.35	119.74	2.3	3.24	86.10%
S.C.12.4	14	4.836	1.1E-02	1.3E-03	6.82	X	X	X	X	7.97	69.16%	0%	69.16%	25.10%	5.51	21.96	2.46	164.71	2.3	3.23	85.28%
S.C.12.6	17	5.872	1.3E-02	1.6E-03	8.27	X			X	7.98	68.58%	0%	68.58%	25.60%	5.47	21.38	2.51	198.32	2.3	3.23	84.88%
S.C.12.7	20	6.908	1.5E-02	1.9E-03	9.72	X			X	7.99	68.17%	0%	68.17%	25.96%	5.45	20.98	2.54	231.93	2.3	3.23	84.61%
S.C.14.1	3	1.036	2.3E-03	3.0E-04	1.51	X	X		X	7.72	80.25%	0%	80.25%	15.75%	6.20	39.34	1.52	40.95	2.3	3.28	91.67%
S.C.14.4	9	3.109	6.9E-03	8.8E-04	4.49	X	X		X	7.78	75.70%	0%	75.70%	19.51%	5.89	30.19	1.89	115.90	2.3	3.27	89.18%
S.C.62.5	2	691	1.5E-03	2.0E-04	1.00	X	X		X	7.80	80.30%	0.04%	80.26%	16.04%	6.26	39.03	1.54	27.31	2.3	3.26	91.64%
S.C.54.5	20	6.908	1.5E-02	1.9E-03	9.71	X	X		X	8.00	68.64%	0%	68.64%	25.39%	5.49	21.63	2.51	233.53	2.3	3.23	85.07%
S.C.65.5	20	6.908	1.5E-02	1.9E-03	9.71	X	X		X	8.00	67.41%	0%	67.41%	26.72%	5.39	20.18	2.61	229.34	2.3	3.23	84.01%
W.42.3	20	6.908	1.5E-02	1.5E-03	7.83	X	X		X	9.92	51.65%	0%	51.65%	32.84%	5.12	15.60	4.80	175.72	2.3	2.99	80.81%
W.42.5	30	10.363	2.3E-02	2.3E-03	11.58	X	X	X		10.06	49.56%	0%	49.56%	34.74%	4.99	14.35	5.07	252.92	2.3	2.98	79.22%
W.42.7	35	12.090	2.7E-02	2.6E-03	13.45	X	X			10.11	48.93%	0%	48.93%	35.33%	4.95	14.00	5.16	291.32	2.3	2.98	78.74%
W.43.5	35	12.090	2.7E-02	2.4E-03	12.31	X	X			11.04	42.44%	0%	42.44%	38.98%	4.69	12.03	6.35	252.68	2.3	2.91	75.84%
W.43.7	38	13.126	2.9E-02	2.6E-03	13.34	X	X	X	X	11.06	42.19%	0%	42.19%	39.21%	4.67	11.90	6.39	272.72	2.3	2.90	75.60%
W.43.8	40	13.817	3.0E-02	2.7E-03	14.02	X	X			11.08	41.97%	0%	41.97%	39.43%	4.65	11.79	6.43	285.58	2.3	2.90	75.39%
W.43.9	42	14.508	3.2E-02	2.9E-03	14.68	X				11.11	41.66%	0%	41.66%	39.74%	4.63	11.65	6.48	297.64	2.3	2.90	75.10%
W.60.5	24	8.290	1.8E-02	1.8E-03	9.42	X	X			9.89	50.42%	0%	50.42%	36.53%	4.99	13.65	4.90	205.85	2.3	3.00	78.05%
Line 2701 Total																		415.20			
Line 2702 Total																		415.20			
Line 2803 Total																		364.97			
Line 2805 Total																		364.97			
Uncontrolled																		1,560.35			
Minimum Control Efficiency (CE) Needed to comply with PSD and HAP Minor Limits:																		85.0675%			
Line 2701 Total																		62.00			
Line 2702 Total																		62.00			
Line 2803 Total																		54.50			
Line 2805 Total																		54.50			
Controlled																		233.00			

Roll Coating Lines - 2701, 2702, 2803, & 2805

Material ID	Weight % HAP1 112-34-5 2-(2-butoxy-ethoxy) ethanol ton/yr	Emissions - HAP1 ton/yr	Weight % HAP2 112-07-2 2-butoxy-ethyl acetate ton/yr	Emissions - HAP2 ton/yr	Weight % HAP3 98-82-8 cumene ton/yr	Emissions - HAP3 ton/yr	Weight % HAP4 100-41-4 ethyl benzene ton/yr	Emissions - HAP4 ton/yr	Weight % HAP5 50-00-0 formal-dehyde ton/yr	Emissions - HAP5 ton/yr	Weight % HAP6 111-90-0 diethylene glycol monoethyl ether ton/yr	Emissions - HAP6 ton/yr	Weight % HAP7 110-54-3 hexane ton/yr	Emissions - HAP7 ton/yr
B.11.7	9.28%	11.38	6.77%	8.30	0.09%	0.11			0.07%	0.09				
B.23.5							3.34%	7.95	0.28%	0.67				
B.24.3					0.55%	1.45	0.92%	2.43						
B.24.5					0.56%	1.76	0.94%	2.96						
B.24.7					0.57%	2.08	0.94%	3.43						
B.24.9					0.57%	2.37	0.95%	3.94						
B.28.5					0.09%	0.26	0.28%	0.79	0.03%	0.09				
B.29.5			18.03%	39.16					0.06%	0.13				
E.33.5							5.16%	7.82						
E.82.5					0.02%	0.02	0.32%	0.31						
G.27.1									0.02%	0.01				
G.27.4									0.03%	0.03				
G.27.7									0.03%	0.04				
G.27.9									0.03%	0.05				
G.70.3					0.43%	0.52	0.17%	0.20	0.06%	0.07				
G.70.5					0.44%	0.63	0.18%	0.26	0.06%	0.09				
G.70.7					0.45%	0.79	0.18%	0.32	0.06%	0.11				
G.122.9					0.09%	0.16			0.06%	0.11				
G.126.5							4.49%	5.44	0.09%	0.11			0.26%	0.32
K.A.1.5					0.05%	0.17	0.04%	0.13						
K.BL.5.7					0.06%	0.16	0.05%	0.13						
K.C.7.5					0.03%	0.09	0.03%	0.09						
K.I.2.3					0.05%	0.12	0.04%	0.10						
K.I.3.5					0.05%	0.15	0.04%	0.12						
K.T.2.5					0.05%	0.13	0.04%	0.10						
K.W.36.5			5.52%	14.85			0.28%	0.75	0.02%	0.05				
K.Y.41.3					0.14%	0.35	0.06%	0.15						
K.Y.41.5					0.14%	0.49	0.07%	0.24						
K.Y.50.5					0.05%	0.17	0.79%	2.67						

Roll Coating Lines - 2701, 2702, 2803, & 2805

Material ID	Weight % HAP1 112-34-5 2-(2-butoxy-ethoxy) ethanol	Emissions - HAP1 ton/yr	Weight % HAP2 112-07-2 2-butoxy-ethyl acetate	Emissions - HAP2 ton/yr	Weight % HAP3 98-82-8 cumene	Emissions - HAP3 ton/yr	Weight % HAP4 100-41-4 ethyl benzene	Emissions - HAP4 ton/yr	Weight % HAP5 50-00-0 formal-dehyde	Emissions - HAP5 ton/yr	Weight % HAP6 111-90-0 diethylene glycol monoethyl ether	Emissions - HAP6 ton/yr	Weight % HAP7 110-54-3 hexane	Emissions - HAP7 ton/yr
O.93.4							0.26%	0.30	0.10%	0.11				
O.93.5							0.26%	0.36	0.11%	0.15				
O.130.3									0.17%	0.15				
O.135.5					0.08%	0.08	0.16%	0.17	0.33%	0.34				
O.136.5							0.12%	0.16						
O.141.1							0.12%	0.12						
O.141.3							0.12%	0.15						
O.141.5							0.12%	0.16						
O.162.5					0.07%	0.08	0.17%	0.19	0.32%	0.36				
O.164.5							0.18%	0.21	0.35%	0.41				
S.C.12.3					0.09%	0.11			0.06%	0.07				
S.C.12.4					0.09%	0.15			0.06%	0.10				
S.C.12.6					0.09%	0.18			0.06%	0.12				
S.C.12.7					0.09%	0.21			0.06%	0.14				
S.C.14.1							3.85%	1.58	0.03%	0.01				
S.C.14.4							4.74%	5.49	0.04%	0.05				
S.C.52.5					0.54%	0.15	0.11%	0.03						
S.C.54.5					0.09%	0.21	0.03%	0.07						
S.C.65.5									0.09%	0.21				
W.42.3														
W.42.5														
W.42.7														
W.43.5														
W.43.7														
W.43.8														
W.43.9														
W.60.5			11.39%	23.45					0.04%	0.08	11.21%	23.08		
Line 2701 Total		11.38		39.16		2.37		7.95		0.67		23.08		0.32
Line 2702 Total		11.38		39.16		2.37		7.95		0.67		23.08		0
Line 2803 Total		11.38		8.30		2.08		7.82		0.34		0		0
Line 2805 Total		0		0		2.08		5.49		0.34		0		0
<b>Uncontrolled</b>		<b>34.13</b>		<b>86.62</b>		<b>8.89</b>		<b>29.21</b>		<b>2.02</b>		<b>46.15</b>		<b>0.32</b>
		70.85%		88.51%		0%		65.92%		0%		78.45%		0%
Line 2701 Total		3.32		4.50		2.37		2.71		0.67		4.97		0.32
Line 2702 Total		3.32		4.50		2.37		2.71		0.67		4.97		0
Line 2803 Total		3.32		0.95		2.08		2.66		0.34		0		0
Line 2805 Total		0		0		2.08		1.87		0.34		0		0
<b>Controlled</b>		<b>9.95</b>		<b>9.95</b>		<b>8.89</b>		<b>9.95</b>		<b>2.02</b>		<b>9.95</b>		<b>0.32</b>

Roll Coating Lines - 2701, 2702, 2803, & 2805

Material ID	Weight % HAP8		Emissions - HAP8		Weight % HAP9		Emissions - HAP9		Weight % HAP10		Emissions - HAP10		Weight % HAP11		Emissions - HAP11		Weight % HAP12		Emissions - HAP12		Weight % HAP13		Emissions - HAP13		HAP Content	Total HAP
	78-59-1 isophorone	ton/yr	67-56-1 methanol	ton/yr	108-10-1 MIBK	ton/yr	91-20-3 naphthalene	ton/yr	108-88-3 toluene	ton/yr	1330-20-7 xylene	ton/yr	lb HAP / gal coating solids	ton/yr												
B.11.7	5.10%	6.25					1.02%	1.25	0.09%	0.11	0.09%	0.11	841.85	27.59												
B.23.5									0.28%	0.67	15.86%	37.74	456.33	47.03												
B.24.3	2.95%	7.80			1.57%	4.15			0.09%	0.24	5.54%	14.64	731.34	30.71												
B.24.5	2.99%	9.41			1.59%	5.00			0.09%	0.28	5.61%	17.65	871.65	37.07												
B.24.7	3.02%	11.02			1.60%	5.84			0.09%	0.33	5.66%	20.66	1009.35	43.36												
B.24.9	3.04%	12.62			1.62%	6.73			0.10%	0.42	5.70%	23.67	1149.95	49.74												
B.28.5							1.95%	5.53	0.09%	0.26	1.20%	3.40	211.52	10.32												
B.29.5													1304.94	39.29												
E.33.5					2.62%	3.97			0.44%	0.67	24.57%	37.22	679.71	49.67												
E.82.5									0.02%	0.02	1.36%	1.33	9.31	1.69												
G.27.1					15.37%	11.39					0.08%	0.06	516.43	11.47												
G.27.4					16.58%	17.88					0.08%	0.09	749.09	18.00												
G.27.7					17.27%	24.41					0.09%	0.13	980.40	24.58												
G.27.9					17.64%	30.86					0.09%	0.16	1212.78	31.07												
G.70.3									0.09%	0.11	5.49%	6.59	39.66	7.49												
G.70.5									0.09%	0.13	1.58%	2.25	45.51	3.35												
G.70.7									0.09%	0.16	1.62%	2.85	55.42	4.23												
G.122.9					14.08%	24.77					0.27%	0.48	975.30	25.51												
G.126.5	7.42%	9.00			2.50%	3.03			0.28%	0.32	21.48%	26.04	766.20	44.25												
K.A.1.9							1.18%	3.92			0.18%	0.60	143.49	4.82												
K.BL.5.7							0.63%	1.65			0.23%	0.60	61.11	2.54												
K.C.7.5							1.23%	3.80			0.17%	0.53	135.86	4.51												
K.L.2.3							1.39%	3.47			0.17%	0.42	128.57	4.12												
K.L.3.5							1.28%	3.75			0.19%	0.56	136.33	4.57												
K.T.2.5							1.37%	3.51			0.17%	0.44	129.13	4.17												
K.W.36.5					0.18%	0.48			2.83%	7.62	0.09%	0.24	1.29%	3.47	834.78	27.48										
K.Y.41.3							2.26%	5.72			1.63%	4.13	215.54	10.36												
K.Y.41.5							2.31%	8.06			1.67%	5.82	296.20	14.61												
K.Y.50.5							1.32%	4.46			3.36%	11.36	233.09	18.67												

Roll Coating Lines - 2701, 2702, 2803, & 2805

Material ID	Weight % HAP8	Emissions - HAP8	Weight % HAP9	Emissions - HAP9	Weight % HAP10	Emissions - HAP10	Weight % HAP11	Emissions - HAP11	Weight % HAP12	Emissions - HAP12	Weight % HAP13	Emissions - HAP13	HAP Content	Total HAP
	78-59-1 isophorone	ton/yr	67-56-1 methanol	ton/yr	108-10-1 MIBK	ton/yr	91-20-3 naphthalene	ton/yr	108-88-3 toluene	ton/yr	1330-20-7 xylene	ton/yr	lb HAP / gal coating solids	ton/yr
O.93.4											1.09%	1.24	19.23	1.65
O.93.5											1.12%	1.54	23.19	2.05
O.130.3											0.43%	0.38	7.34	0.54
O.135.5							2.71%	2.83	0.08%	0.08	0.82%	0.86	106.96	4.36
O.136.5									0.01%	0.01	0.53%	0.72	7.99	0.90
O.141.1							0.12%	0.12	0.01%	0.01	0.49%	0.49	11.46	0.74
O.141.3							0.13%	0.16	0.01%	0.01	0.51%	0.63	14.13	0.95
O.141.5							0.13%	0.18	0.01%	0.01	0.51%	0.69	15.25	1.04
O.162.5							4.33%	4.85	0.08%	0.09	0.83%	0.93	164.91	8.49
O.164.5							1.63%	1.89			0.79%	0.92	81.90	3.42
S.C.12.3					13.43%	16.08					0.26%	0.31	665.09	16.57
S.C.12.4					13.99%	23.04					0.27%	0.44	912.93	23.73
S.C.12.6					14.25%	28.26					0.27%	0.54	1098.05	29.09
S.C.12.7					14.43%	33.47					0.28%	0.65	1282.95	34.46
S.C.14.1	6.40%	2.62	0.07%	0.03	2.13%	0.87			0.34%	0.14	18.44%	7.55	331.42	12.80
S.C.14.4	7.87%	9.12	0.08%	0.09	2.62%	3.04			0.42%	0.49	22.69%	26.30	910.56	44.57
S.C.52.5					3.10%	0.85					11.68%	3.19	68.69	4.21
S.C.54.5					18.59%	43.41					0.09%	0.21	1696.93	43.90
S.C.65.5					15.88%	36.42							1351.73	36.63
W.42.3											0.62%	1.09	0.19	1.09
W.42.5											0.65%	1.64	0.19	1.64
W.42.7											0.66%	1.92	0.19	1.92
W.43.5							0.82%	2.07			0.16%	0.40	72.40	2.48
W.43.7							0.78%	2.13			0.16%	0.44	73.97	2.56
W.43.8							0.74%	2.11			0.16%	0.46	73.20	2.57
W.43.9							0.70%	2.08			0.16%	0.48	71.79	2.56
W.60.5													1555.92	46.60
Line 2701 Total		12.62		0.09		43.41		7.62		0.67		37.74		49.74
Line 2702 Total		12.62		0.09		43.41		8.06		0.67		37.74		49.74
Line 2803 Total		11.02		0		24.77		5.53		0.67		37.22		49.67
Line 2805 Total		11.02		0.09		43.41		5.53		0.67		26.30		44.57
Uncontrolled		47.29		0.28		155.01		26.73		2.67		139.00		193.72
		78.95%		0%		93.58%		62.78%		0%		92.84%		88.49%
Line 2701 Total		2.66		0.09		2.79		2.83		0.67		2.70		5.73
Line 2702 Total		2.66		0.09		2.79		3.00		0.67		2.70		5.73
Line 2803 Total		2.32		0		1.99		2.06		0.67		2.66		5.72
Line 2805 Total		2.32		0.09		2.79		2.06		0.67		1.88		5.13
Controlled		9.95		0.28		9.95		9.95		2.67		9.95		22.30

**Roll Coating Operations - Lines 2701, 2702, 2803, and 2805**

**METHODOLOGY**

$$x \frac{34.812 \text{ in}}{39.69 \text{ in}} = 1,382 \text{ sq-in}$$
 Surface Area of each metal sheet  
  
 5,100 sheets/hr Line Capacity (each Line) Maximum

**Test Data**

Capture Efficiency =	95.11%	March 2009 stack test
Destruction Efficiency =	98.36%	February 2009 stack test
Overall Efficiency =	93.55%	

Roll Coating => assumed 100% transfer efficiency (no PM emissions)

Usage (mg/ 4 sq-in) is based on the Coatings used from 1/1/10 - 6/30/11. The "X" indicates if the coating was used on a particular coating line for this time period.

Usage (mg/sq-in) = Usage (mg/ 4 sq-in) x Surface Area (sq-in/sheet) / 4

Usage (lb/sheet) = Usage (mg/sheet) x 2.204623e-6 lb/mg

Usage (gal/sheet) = Usage (lb/sheet) / Density (lb/gal)

Usage (gal/hr) = Usage (gal/sheet) x Line Capacity (sheets/hr)

Density (lb/gal) was provided on the Silgan VOC Data Sheets

Volatiles Content (wt %) was provided on the Silgan VOC Data Sheets

Water Content (wt %) was provided on the Silgan VOC Data Sheets

VOC Content (wt %) = Total Volatiles (wt %) - Water Content (wt %) - Exempt Volatiles (wt %)

Solids Content (vol %) was provided on the Silgan VOC Data Sheets

VOC Content less water (lb/gal) = Density (lb/gal) x [ Total Volatiles (wt %) - Water Content (wt %) - Exempt Volatiles (wt %) ] / [ 1 - Water Content (vol %) - Exempt Volatiles (vol %) ]

VOC Content (lb/gal solids) = Density (lb/gal) x [ Total Volatiles (wt %) - Water Content (wt %) - Exempt Volatiles (wt %) ] / Solids Content (vol %)

VOC Content (lb/gal) = Density (lb/gal) x [ Total Volatiles (wt %) - Water Content (wt %) - Exempt Volatiles (wt %) ]

HAP Content (lb/gal solids) = Sum [ CAS (wt %) where CAS = CAAA HAP ] x Density / Solids Content (vol %)

Potential VOC (lb/hr) = VOC Content less water (lb/gal) x Usage (gal/hr)

Potential VOC (ton/yr) = Potential VOC (lb/hr) x (8760 hr/yr) x (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) x Weight % organics) / (Volume % solids) [See calculation methodology below for equivalent emission limit per 326 IAC 8-1-2(b).]

Potential HAP (lb/hr) = VOC Content less water (lb/gal) x HAP (wt %) x Usage (gal/hr)

Potential HAP (ton/yr) = Potential HAP (lb/hr) x (8760 hr/yr) x (1 ton/2000 lbs)

**Lithographic Printing Presses - Lines 2803 and 2805**

Ink Density: 10.0 lb/gal  
 Line Capacity: 4,200 sheets/hr  
 Maximum Ink Usage: 3 lb/ 1000 sheets  
                           12.6 lb/hr  
                           1.26 gal/hr  
                           11,038 gal/yr

Ink Name: INX INK869	Density (lb/gal)	Weight % HAP (%)	Max. Usage (gal/yr)	HAP Emissions (ton/yr)
<b>Ink Press on Line 2803 - installed 1970</b>				
Manganese Compounds	10.0	0.85%	11,038	0.47
Dimethyl Phthalate	10.0	0.18%	11,038	9.9E-02
Toluene	10.0	0.03%	11,038	1.7E-02
Glycol Ethers	10.0	0.01%	11,038	5.5E-03
Cobalt Compounds	10.0	0.01%	11,038	5.5E-03
Hydroquinone	10.0	0.01%	11,038	5.5E-03
Acrylic Acid	10.0	0.01%	11,038	5.5E-03
Total HAP		1.10%		0.61
<b>Ink Press on Line 2805 - installed 1986</b>				
Manganese Compounds	10.0	0.85%	11,038	0.47
Dimethyl Phthalate	10.0	0.18%	11,038	9.9E-02
Toluene	10.0	0.03%	11,038	1.7E-02
Glycol Ethers	10.0	0.01%	11,038	5.5E-03
Cobalt Compounds	10.0	0.01%	11,038	5.5E-03
Hydroquinone	10.0	0.01%	11,038	5.5E-03
Acrylic Acid	10.0	0.01%	11,038	5.5E-03
Total HAP		1.10%		0.61
Totals for both presses	single HAP	Manganese Compounds		0.94
Totals for both presses	Total HAP			1.21

**METHODOLOGY**

Estimated Emissions Tons per Year = Wt % HAP x Maximum Usage (Gal/year) x Density (Lb/Gal) x (1 ton/2000 Lbs)

Ink Name: INX INK869	Density (lb/gal)	Weight % VOC (%)	Max. Usage (gal/yr)	VOC Emissions (ton/yr)
<b>Ink Press on Line 2803 - installed 1970</b>				
VOC	10.0	2.04%	11,038	1.13
<b>Ink Press on Line 2805 - installed 1986</b>				
VOC	10.0	2.04%	11,038	1.13
Totals for both presses	VOC			2.25

**METHODOLOGY**

Estimated Emissions Tons per Year = Wt % VOC x Maximum Usage (Gal/year) x Density (Lb/Gal) x (1 ton/2000 Lbs)

## Compound Manufacturing

The compound mixing room mixes dry and wet ingredients to manufacture the plastisol that is used in another operation in the facility. Plastisol is the material on the inside of a metal cap that seals the cap to the bottle. The compound mixing room consists of mixing a dry product with a liquid. In the area where it is mixed there is a small exhaust blower with fiberglass filters and then the exhaust exits out the roof. It is not a continuous operation, they will make a batch and then it will be at least 30 minutes before the next batch.

No. of Units:	1 constructed in 2003
Batch Time:	30 min
Capacity:	20 tons plastisol/day 48 batches/day 0.417 tons plastisol/batch 0.833 tons plastisol/hr

VOC usage: none

PM usage:	20 lb/ton plastisol	<i>provided by Silgan</i>
	20 lb/ton pigment	<i>AP-42, Ch. 6.4 (Paint Manufacturing)</i>

### Uncontrolled

PM/PM <sub>10</sub> /PM <sub>2.5</sub> Emissions:	16.67 lb/hr 400 lb/day 73.00 ton/yr
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### Limited

PM/PM <sub>10</sub> /PM <sub>2.5</sub> Emissions:	7.00 ton/yr 1.60 lb/hr
---	---------------------------

### Controlled

PM Control Efficiency:	95% fiberglass filters
PM/PM <sub>10</sub> /PM <sub>2.5</sub> Emissions:	20.0 lb/day 3.65 ton/yr 0.83 lb/hr

Assumed Grain Loading:	0.03 gr/dscf
Assumed Air Flow Rate:	6,481 CFM

### **326 IAC 6.5 (Particulate Emission Limitations except Lake County)**

Silgan intends to limit the PTE for particulate matter to less than 10 tons per year for the entire source. Therefore, the requirements of 326 IAC 6.5 will not be applicable.

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

$E = 4.10 P^{0.67}$       where      E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour  
P = 0.83 ton/hr      1,667 lb/hr  
  
E = 3.63 lb/hr  
15.89 ton/yr

**Insignificant Activities**

**UV Ink Process**

Line Capacity: 4,800 sheets/hr  
 Maximum Ink Weight: 0.6893 lb/ 1000 sheets  
 Maximum Ink Usage: 3.30864 lb/hr  
 28,984 lb/yr

Line #	Weight % VOC (%)	VOC Emissions			Weight % Toluene (%)	Toluene Emissions		
		(lb/hr)	(lb/yr)	(ton/yr)		(lb/yr)	(ton/yr)	
UV-1	0.108%	3.57E-03	31.30	0.0157	0.108%	3.57E-03	31.30	0.0157

The UV ink contains only one HAP, toluene. The wt% Toluene is provided from the MSDS for the Ink material. All of the VOC is HAP toluene.

VOC Emissions: 0.0858 lb/day

**Methodology**

VOC PTE (lb/hr) = Maximum UV Ink Use (lb/hr) x Wt% VOC  
 VOC PTE (lb/yr) = Maximum UV Ink Use (lb/yr) x Wt% VOC  
 VOC PTE (ton/yr) = Maximum UV Ink Use (lb/yr) x Wt% VOC x 1 ton/2000 lbs  
 HAP PTE (lb/hr) = Maximum UV Ink Use (lb/hr) x Wt% Toluene  
 HAP PTE (lb/yr) = Maximum UV Ink Use (lb/yr) x Wt% Toluene  
 HAP PTE (ton/yr) = Maximum UV Ink Use (lb/yr) x Wt% Toluene x 1 ton/2000 lbs

**Solvent Cleaning**

Usage: 2 gal/hr  
 17,520 gal/yr  
 Density: 8.33 lb/gal  
 Temperature: 70 F  
 VOC Content: 1 lb/gal  
  
 VOC PTE: 8.76 ton/yr

**Blowdown**

PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions: negligible  
 VOC Emissions: negligible

**Waxers**

Waxers are electrostatic lubricators. They apply a paraffin wax to the sheet of coated metal.

No. of Units: 2 constructed in 1970

PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions: negligible  
 VOC Emissions: negligible

**Scroll Shears**

Each scroll shear takes a sheet of coated metal and chops it into pieces that will fit into machines further down in the manufacturing process.

No. of Units: 7 constructed in 1970  
 Line Speed: 24 sheets/min  
 1,440 sheets/hr  
 PM Emission Rate: 0.08 lb/2000 sheets \*      \*estimated maximum based on Process measurements from October 4, 2011. Measurement scale is calibrated to 0.1 lb  
 0.058 lb/hr  
 0.252 ton/yr      *per scroll shear*  
 504.58 lb/yr      *per scroll shear*  
  
**1.77 ton/yr      Total PTE**  
  
 Maximum Process Weight: 5,000 lb/2000 sheets \*      *per scroll shear*  
 2.50 lb/sheet  
 3,600 lb/hr  
 1.80 ton/hr

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

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

P = 1.80 ton/hr      3,600 lb/hr  
 E = 6.08 lb/hr      26.63 ton/yr      *per scroll shear*

VOC Emissions: none

**Quantification of PM Emissions from the Scroll Shears**

Trial Date: 10/4/2011

Silgan uses two different types of slit sheets. One has a gold coating and the other has a white coating with blue print. Both sheet types are coated and pass through the waxers prior to the scroll shears operation. Because the slit sheets are stacked in 1000s and all the large sheets are slit into four pieces, the trial was conducted using multiples of 250 sheets.

Gold Coating	weight before scroll shears	weight of trim pieces	Percent Loss	weight of good pieces	total weight after scroll shears
250 sheets	610.5 lbs	7.7 lbs	1.3%	602.8 lbs	610.5 lbs
500 sheets	1,219.4 lbs	14.7 lbs	1.2%	1,204.7 lbs	1,219.4 lbs
2000 sheets	4,859.0 lbs	58.6 lbs	1.2%	4,800.4 lbs	4,859.0 lbs

White Coating with Blue print	weight before scroll shears	weight of trim pieces	Percent Loss	weight of good pieces	total weight after scroll shears
250 sheets	625.5 lbs	8.2 lbs	1.3%	617.3 lbs	625.5 lbs
500 sheets	1,249.4 lbs	16.0 lbs	1.3%	1,233.4 lbs	1,249.4 lbs
2000 sheets	4,978.9 lbs	64.1 lbs	1.3%	4,914.8 lbs	4,978.9 lbs

Based on this trial, the process weight rate for each scroll shear will be assumed to be 5000 lb/2000 sheets. The loss rate of 1.3% will not be used as the particulate emissions factor because each trim piece is a sliver of the metal sheet that weighs approximately 0.5 ounces.

**Remarks:** Silgan found some metal fines around and below the area where the sheets were sheared; however, the measurement scale used for the trial is only calibrated to one tenth of a pound, and the amount of material prior to cutting was equal to the amount of good pieces plus trim pieces, the amount of fines were assumed to be less than one tenth of a pound.

The range of values that would measure as one tenth of a pound is 0.14 to 0.05 (on the scale used by Silgan for this trial). Therefore the PM emission rate of the PM fines will be estimated as 0.08 lb/2000 sheets.

**Natural Gas Combustion - <100 MMBtu/hr**

Emission Unit	Heat Input Capacity	Potential Throughput	Installation Date
Bryan Boiler	0.45 MMBtu/hr	3.94 MMCF/yr	1996
16 Plastisol Line curing ovens	83.2 MMBtu/hr	728.83 MMCF/yr	1986
18 space heaters	3.06 MMBtu/hr	26.81 MMCF/yr	1986
3 rapid air units	8.685 MMBtu/hr	76.08 MMCF/yr	1986
mix room heater	0.6 MMBtu/hr	5.26 MMCF/yr	1986
Plastisol Line 4114 burner	0.12 MMBtu/hr	1.05 MMCF/yr	1986
Cap Manufacturing curing ovens	3.2 MMBtu/hr	28.03 MMCF/yr	1986
Line 2805 curing oven	6.0 MMBtu/hr	52.56 MMCF/yr	1986
Line 2701 curing oven	4.0 MMBtu/hr	35.04 MMCF/yr	1970
Line 2702 curing oven	4.65 MMBtu/hr	40.73 MMCF/yr	1970
Line 2803 curing oven	3.0 MMBtu/hr	26.28 MMCF/yr	1970
Cannister RTO	6.0 MMBtu/hr	52.56 MMCF/yr	1970
Maximum Capacity:	123.0 MMBtu/hr	1077.17 MMCF/yr	

Potential To Emit - Regulated Pollutants							
	CO	NO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
Emission Factor (lb/MMCF)	84	100	1.9	7.6	7.6	0.6	5.5
Uncontrolled Potential To Emit (ton/yr)	45.24	53.86	1.02	4.09	4.09	0.32	2.96

\*PM emission factor is filterable PM only. PM<sub>10</sub> emission factor is filterable and condensable PM<sub>10</sub> combined.  
 \*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

Potential To Emit - Hazardous Air Pollutants											
	HAPs - Organics					HAPs - Metals					Total HAPs
	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni	
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Uncontrolled Potential To Emit (ton/yr)	1.1E-03	6.5E-04	4.0E-02	0.97	1.8E-03	2.7E-04	5.9E-04	7.5E-04	2.0E-04	1.1E-03	1.02

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

	Greenhouse Gases		
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Emission Factor (lb/MMCF)	120,000	2.3	2.2
Global Warming Potential (GWP)	1	21	310
Uncontrolled Potential To Emit (ton/yr)	64,630	1.24	1.18
Total Potential to Emit (ton/yr)	64,633		
<b>CO<sub>2</sub>e Total in tons/yr</b>	<b>65,024</b>		

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 The N<sub>2</sub>O Emission Factor for uncontrolled is 2.2. The N<sub>2</sub>O Emission Factor for low Nox burner is 0.64.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 Emission (ton/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / 2,000 lb/ton  
 CO<sub>2</sub>e (ton/yr) = CO<sub>2</sub> Potential Emission (ton/yr) x CO<sub>2</sub> GWP + CH<sub>4</sub> Potential Emission (ton/yr) x CH<sub>4</sub> GWP + N<sub>2</sub>O Potential Emission (ton/yr) x N<sub>2</sub>O GWP

**326 IAC 6-2 Evaluation**

Combustion Unit	Installation Date	Rating (MMBtu/hr)	Q (MMBtu/hr)	Pt (lb/MMBtu) (if Q <10)	PM Emissions (lb/hr)	PM Emissions (ton/yr)	Applicable Rule
Bryan Boiler	1996	0.45	116.965	0.32	36.96	161.91	326 IAC 6-2-4
16 Plastisol Line curing ovens	1986	83.2	116.515	0.32	36.86	161.44	326 IAC 6-2-4
18 space heaters	1986	3.06					
3 rapid air units	1986	8.685					
mix room heater	1986	0.6					
Plastisol Line 4114 burner	1986	0.12					
Cap Manufacturing curing ovens	1986	3.2					
Line 2805 curing oven	1986	6.0	11.65	0.87	10.11	44.29	326 IAC 6-2-3
Line 2701 curing oven	1970	4.0					
Line 2702 curing oven	1970	4.65					
Line 2803 curing oven	1970	3.0					

[326 IAC 6-2-3]

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu). Actual Values  
 C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal  $50 \mu/m^3$  for a period not to exceed 60 minutes. 50  
 a = Plume rise factor. The value **0.67** shall be used for Q less than or equal to 1000 MMBtu/hr. The value 0.8 shall be used for Q greater than 1000 MMBtu/hr. 0.67  
 h = Stack height in feet. 12.5  
 Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr).  
 N = Number of stacks in fuel burning operation. 1

[326 IAC 6-2-4]

$$Pt = \frac{1.09}{Q^{0.26}} \Rightarrow 9/21/1983$$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).  
 Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr).



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

*Thomas W. Easterly*  
**Commissioner**

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Indianapolis, Indiana 46204  
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Toll Free (800) 451-6027  
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## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

**TO:** Timothy White  
Silgan White Cap Corporation  
5701 Frontier Rd  
Oconomowoc, WI 53066

**DATE:** December 29, 2011

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

**SUBJECT:** Final Decision  
Title V - Renewal  
163-30180-00003

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:  
John Bugnitz (Plant Manager)  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

December 29, 2011

TO: Willard Library of Evansville

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

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

**Applicant Name: Silgan White Cap Corporation**  
**Permit Number: 163-30180-00003**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	MIDENNEY 12/29/2011 Silgan White Cap Corporation 163-30180-00003 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
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2		John Bugnitz Plant Mgr Silgan White Cap Corporation 2201 W Maryland St Evansville IN 47712 (RO CAATS)										
3		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 (Local Official)										
4		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
5		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
6		Willard Library of Evansville 21 First Ave Evansville IN 47710-1294 (Library)										
7		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
8		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
9		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
10		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)										
11		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
12		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)										
13												
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