



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
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: March 7, 2013

RE: EDCOAT Limited Partnership / 141 - 32316 - 00102

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

**EDCOAT Limited Partnership  
30350 Edison Road  
New Carlisle, Indiana 46552**

(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.: T141-32316-00102	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 7, 2013 Expiration Date: March 7, 2018

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**Attachment B: 40 CFR 63 Subpart SSSS - National Emission Standards for Hazardous Air  
Pollutants: Surface Coating of Metal Coil**

## 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(14)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary roll coil coating manufacturing plant.

Source Address:	30350 Edison Road, New Carlisle, Indiana 46552
General Source Phone Number:	(574) 654-9105
SIC Code:	3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules
	Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Upper Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.
- (b) One (1) roll coil finish/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Lower Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.

The Upper and Lower Coating Rooms are considered affected facilities under 40 CFR 60, Subpart TT and 40 CFR 63, Subpart SSSS.

Note: Sometimes only one coating is applied, making the prime coating application system (Upper Coating Room) the finish/top coating application system (Lower Coating Room). The Upper and Lower Coating Rooms operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products. Therefore, the two coating systems are considered a single process, identified as the Roll Coil Coating Application System.

In addition, the the thermal oxidizer is a common control device for the Upper Coating Room and Lower Coating Room, exhausting to a common stack.

- (c) Two (2) natural-gas fired bake ovens in the coating application system, which collectively include the following process burners:
  - (1) Six (6) model 4988R-2500 natural gas-fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
  - (2) Four (4) model 4988R-4000 natural gas-fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
  - (3) Four (4) model 4988R-6000 natural gas-fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996
- (d) One (1) natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)]  
[326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

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

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

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

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, T141-32316-00102, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), 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(35).

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

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

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

and

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

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

The submittal by the Permittee does require 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(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][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(35).

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(35).

- (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]

- (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 Northern 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  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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(35).

(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)(8) 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]

- (a) All terms and conditions of permits established prior to T141-32316-00102 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require 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(35).

- (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)]

- (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(35).

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(35).

(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) or (c) 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)(1) and (c)(1). 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) and (c)(1).

- (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(35).

- (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(35).

- (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(35).

- (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(35).

- (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(35).
- (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(35).

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(35).

**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]**

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 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(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the Part 70 permit.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

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]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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(35). 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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Upper Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.
- (b) One (1) roll coil finish/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Lower Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.

The Upper and Lower Coating Rooms are considered affected facilities under 40 CFR 60, Subpart TT and 40 CFR 63, Subpart SSSS.

Note: Sometimes only one coating is applied, making the prime coating application system (Upper Coating Room) the finish/top coating application system (Lower Coating Room). The Upper and Lower Coating Rooms operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products. Therefore, the two coating systems are considered a single process, identified as the Roll Coil Coating Application System.

In addition, the thermal oxidizer is a common control device for the Upper Coating Room and Lower Coating Room, exhausting to a common stack.

- (c) Two (2) natural-gas fired bake ovens in the coating application system, which collectively include the following process burners:
  - (1) Six (6) model 4988R-2500 natural gas-fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
  - (2) Four (4) model 4988R-4000 natural gas-fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
  - (3) Four (4) model 4988R-6000 natural gas-fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996
- (d) One (1) natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14.

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

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

#### D.1.1 PSD Minor Limit for Volatile Organic Compounds (VOC) [326 IAC 2-2]

The VOC input to the Roll Coil Coating Application System (Upper Coating Room and Lower Coating Room) shall be limited such that the VOC emissions are less than or equal to 246.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-4]**

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Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), the Permittee may not cause, allow or permit the discharge into the atmosphere any VOC in excess of 2.6 pounds per gallon, excluding water, delivered to the applicator from prime and topcoat or single coat operations.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

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

**Compliance Determination Requirements**

**D.1.4 Thermal Oxidizer Operation**

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In order to comply with Conditions D.1.1 and D.1.2, the thermal oxidizer shall be in operation when the Upper or Lower Coating Room is in operation, except as other wise provided by statute or rule or in this permit.

**D.1.5 Testing Requirements [326 IAC 2-1.1-11]**

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- (a) In order to determine compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform overall control efficiency (capture and destruction) testing of the thermal oxidizer for VOC and determine the 3-hour average temperature, and the differential pressure of the Upper and Lower Coating Rooms, utilizing methods approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.
- (b) The Permittee shall also determine the following criteria for the permanent total enclosure for the Upper and Lower Coating Rooms:
- (1) Any Natural Draft Opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure which remains open during the operation of the facility and is not connected to a duct in which a fan is installed.
  - (2) The total area of all NDO's shall not exceed five percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - (3) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 ft/min) or the differential pressure drop of -0.007 inches of water (USEPA Method 204). The direction of air through all NDO's shall be into the enclosure.
  - (4) All access doors and windows whose areas are not included in condition (2) and are not included in the calculation of condition (3) shall be closed during routine operation of the process.
  - (5) All VOC emissions must be captured and contained for discharge through the control device.

#### D.1.6 Volatile Organic Compound (VOC)

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- (a) Compliance with the VOC limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, VOC certifications or VOC certificates of analysis. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) In order to demonstrate compliance with the VOC emission limitation in Condition D.1.1, the Permittee shall determine VOC emissions for each month, using the following methodology:

- (i) When Thermal Oxidizer is operating:

$$\text{VOC Emissions} = [(\text{VOC usage}) \times (1 - \text{CE}/100)]$$

Where:

VOC usage = Upper and Lower Coating Application System VOC usage

CE = 90.9% (November 2010 stack test) or the overall control efficiency of the thermal oxidizer from the most recent valid compliance demonstration

- (ii) When Thermal Oxidizer is not operating:

$$\text{VOC emissions} = \text{VOC usage}$$

- (iii) Total VOC Emissions =  $[(\text{VOC usage}) \times (1 - \text{CE}/100)] + (\text{Uncontrolled VOC usage})$

- (c) Pursuant to 326 IAC 8-1-2(b)(1) and 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be equal to or greater than the equivalent overall efficiency calculated by the following equations:

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

Where:

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

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. E is calculated as follows:

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

Where:

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

L = Applicable emission limit from 326 IAC 8-2-4 in pounds of VOC per gallon of coating (2.6 lbs of VOC/gal)

D = Baseline solvent density of VOC in the coating and shall be equal to 7.36 pounds of VOC per gallon of solvent

O = 90.9%, when V = 44.11 lbs VOC/gal solids and E = 4.02 lbs VOC/gal solids

- (d) In order to determine compliance with Condition D.1.2, for days when the thermal oxidizer is used intermittently during the day, or not used at all during the day, compliance with the limit shall be based on the following equation:

$$A = [(C \times U) / U]_{NT} + [(100\% - R) \times [(C \times U) / U]_T] \leq 2.6 \text{ lb VOC/gal, excluding water}$$

Where:

A = Daily volume weighted average in pounds VOC per gallon

C = VOC content of coating in pounds VOC per gallon

U = usage rate of coating in gallons per day

R = 90.9% (November 2010 stack test) or the overall control efficiency of the thermal oxidizer from the most recent valid compliance demonstration

NT: refers to applications during which the oxidizer is not operated at or above a three- hour average temperature of 1310 °F (November 2010 stack test), or the latest tested temperature at which compliance is demonstrated

T: refers to applications during which the oxidizer is operated at or above a three- hour average temperature of 1310 °F (November 2010 stack test), or the latest tested temperature at which compliance is demonstrated

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

#### D.1.7 Thermal Oxidizer

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For purposes of this condition continuous shall mean temperature measurement no less often than once per fifteen minutes. The output of this system shall be recorded as a three (3) hour average.
- (b) The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1310 °F. When for any one reading, the temperature is below 1310 °F, the Permittee shall take reasonable response steps. Section C- Response to Excursions and Exceedances contains the Permittee's obligations with regard to the response steps required by this condition. A reading that is below the temperature of 1310 °F is not a deviation from this permit. Failure to take response steps shall be considered as a deviation from the permit.
- (c) The capture system of the Upper and Lower Coating Rooms for the metal coil coating operation shall maintain total permanent enclosure.
- (d) Differential pressure of the Upper and Lower Coating Rooms each shall be at least - 0.007 inches of water. Differential pressure of the coating rooms shall be recorded at least once per day when in operation. When for any one reading, the differential pressure is less than -0.007 inches of water, the Permittee shall take reasonable response steps. Section C- Response to Excursions and Exceedances contains the Permittee's obligations with regard to the response steps required by this condition. A reading that is less than -0.007 inches of water is not a deviation from this permit. Failure to take response steps shall be considered as a deviation from the permit.

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

### D.1.8 Record Keeping Requirement

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- (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 daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.2..
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used.
    - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS), or other documentation 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;
  - (4) The total VOC usage for each month; and
  - (5) The volume weighted average VOC content of the coatings used for each day;
- (b) To document the compliance status with Conditions D.1.7(a) and (b), the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test or maintain a record of the reason why the continuous temperature records were not taken. (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.7(d), the Permittee shall maintain a daily record of the differential pressure across the enclosure when in operation. The Permittee shall include a daily record of the pressure drop reading and the reason for the lack of a pressure drop reading notation (e.g. the process did not operate that day).
- (d) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain a record of the operating times of the thermal oxidizer.
- (e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

### D.1.9 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

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

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

#### D.2.1 Cold Cleaner Operation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Upper Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.
- (b) One (1) roll coil finish/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Lower Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.

The Upper and Lower Coating Rooms are considered affected facilities under 40 CFR 60, Subpart TT and 40 CFR 63, Subpart SSSS.

Note: Sometimes only one coating is applied, making the prime coating application system (Upper Coating Room) the finish/top coating application system (Lower Coating Room). The Upper and Lower Coating Rooms operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products. Therefore, the two coating systems are considered a single process, identified as the Roll Coil Coating Application System.

In addition, the thermal oxidizer is a common control device for the Upper Coating Room and Lower Coating Room, exhausting to a common stack.

- (c) Two (2) natural-gas fired bake ovens in the coating application system, which collectively include the following process burners:
  - (1) Six (6) model 4988R-2500 natural gas-fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
  - (2) Four (4) model 4988R-4000 natural gas-fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
  - (3) Four (4) model 4988R-6000 natural gas-fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996
- (d) One (1) natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14.

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

### National Source Performance Standards (NSPS) Requirements [40 CFR 60]

#### E.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-

1-1 for facilities described in this section except as otherwise specified in 40 CFR Part 60, Subpart TT.

- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 Standards of Performance for Metal Coil Surface Coating [40 CFR Part 60, Subpart TT][326 IAC 12-1]

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- (a) Pursuant to 40 CFR Part 60, Subpart TT, the Permittee shall comply with the provisions of Standards of Performance for Metal Coil Surface Coating (included as Attachment A of this permit), which are incorporated by reference as 326 IAC 12 for the roll coil coating application system as specified as follows:

- (1) 40 CFR 60.460
- (2) 40 CFR 60.461
- (3) 40 CFR 60.462 (a)(4)
- (4) 40 CFR 60.463 (a), (b), (c)(4)
- (5) 40 CFR 60.464 (b), (c)
- (6) 40 CFR 60.465
- (7) 40 CFR 60.466

E.1.3 Testing Requirements [326 IAC 2-1.1-11]

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The Permittee shall perform the stack testing required under 40 CFR 60, Subpart TT, utilizing methods as approved by the Commissioner to document compliance with Condition E.1.2. These tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

## SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Upper Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.
- (b) One (1) roll coil finish/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Lower Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.

The Upper and Lower Coating Rooms are considered affected facilities under 40 CFR 60, Subpart TT and 40 CFR 63, Subpart SSSS.

Note: Sometimes only one coating is applied, making the prime coating application system (Upper Coating Room) the finish/top coating application system (Lower Coating Room). The Upper and Lower Coating Rooms operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products. Therefore, the two coating systems are considered a single process, identified as the Roll Coil Coating Application System.

In addition, the thermal oxidizer is a common control device for the Upper Coating Room and Lower Coating Room, exhausting to a common stack.

- (c) Two (2) natural-gas fired bake ovens in the coating application system, which collectively include the following process burners:
  - (1) Six (6) model 4988R-2500 natural gas-fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
  - (2) Four (4) model 4988R-4000 natural gas-fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
  - (3) Four (4) model 4988R-6000 natural gas-fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996
- (d) One (1) natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14.

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [40 CFR 63]

#### E.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-

1-1 for facilities described in this section as specified in Table 2 to 40 CFR Part 63, Subpart SSSS in accordance with the schedule in 40 CFR Part 63, Subpart SSSS.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

**E.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Coil [40 CFR Part 63, Subpart SSSS][326 IAC 20-64]**

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- (a) Pursuant to 40 CFR Part 63, Subpart SSSS, the Permittee shall comply with the provisions of National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil (included as Attachment B of this permit), which are incorporated by reference as 326 IAC 20-64 for the roll coil coating application system as specified as follows:

- (1) 40 CFR 63.5080
- (2) 40 CFR 63.5090
- (3) 40 CFR 63.5100
- (4) 40 CFR 63.5110
- (5) 40 CFR 63.5120
- (6) 40 CFR 63.5121
- (7) 40 CFR 63.5130
- (8) 40 CFR 63.5140
- (9) 40 CFR 63.5150
- (10) 40 CFR 63.5160
- (11) 40 CFR 63.5170
- (12) 40 CFR 63.5180
- (13) 40 CFR 63.5190
- (14) 40 CFR 63.5200
- (15) Table 1 and 2 of 40 CFR 63 Subpart SSSS

**E.2.3 Testing Requirements [326 IAC 2-1.1-11]**

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The Permittee shall perform the stack testing required under 40 CFR 63, Subpart SSSS, utilizing methods as approved by the Commissioner to document compliance with Condition E.1.2. These tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

Source Name: EDCOAT Limited Partnership  
Source Address: 30350 Edison Road, New Carlisle, Indiana 46552  
Part 70 Permit No.: T141-32316-00102

**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: EDCOAT Limited Partnership  
Source Address: 30350 Edison Road, New Carlisle, Indiana 46552  
Part 70 Permit No.: T141-32316-00102

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

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

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: EDCOAT Limited Partnership  
Source Address: 30350 Edison Road, New Carlisle, Indiana 46552  
Part 70 Permit No.: T141-32316-00102  
Facility: Roll Coil Coating Application System (Upper and Lower Coating Rooms)  
Parameter: VOC  
Limit: 246.7 tons per twelve consecutive months

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: \_\_\_\_\_

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

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

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

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

**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: EDCOAT Limited Partnership  
 Source Address: 30350 Edison Road, New Carlisle, Indiana 46552  
 Part 70 Permit No.: T141-32316-00102

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

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement (specify permit condition #)</b>	
<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 (specify permit condition #)</b>	
<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 (specify permit condition #)</b>	
<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 (specify permit condition #)</b>	
<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 (specify permit condition #)</b>	
<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 Quality  
Office of Air Quality**

**Attachment A**

**Title 40: Protection of Environment**

Part 60 - Standards of Performance for New Stationary Sources (NSPS)

**Subpart TT - Standards of Performance for Metal Coil Surface Coating**

**Source:** 47 FR 49612, Nov. 1, 1982, unless otherwise noted

**§ 60.460 Applicability and designation of affected facility.**

(a) The provisions of this subpart apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

(b) This subpart applies to any facility identified in paragraph (a) of this section that commences construction, modification, or reconstruction after January 5, 1981.

**§ 60.461 Definitions.**

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

*Coating* means any organic material that is applied to the surface of metal coil.

*Coating application station* means that portion of the metal coil surface coating operation where the coating is applied to the surface of the metal coil. Included as part of the coating application station is the flashoff area between the coating application station and the curing oven.

*Curing oven* means the device that uses heat or radiation to dry or cure the coating applied to the metal coil.

*Finish coat operation* means the coating application station, curing oven, and quench station used to apply and dry or cure the final coating(s) on the surface of the metal coil. Where only a single coating is applied to the metal coil, that coating is considered a finish coat.

*Metal coil surface coating operation* means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.

*Prime coat operation* means the coating application station, curing oven, and quench station used to apply and dry or cure the initial coating(s) on the surface of the metal coil.

*Quench station* means that portion of the metal coil surface coating operation where the coated metal coil is cooled, usually by a water spray, after baking or curing.

*VOC content* means the quantity, in kilograms per liter of coating solids, of volatile organic compounds (VOC's) in a coating.

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

$C_a$  = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).

$C_b$  = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).

$C_f$  = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon).

$D_c$  = density of each coating, as received (kilograms per liter).

$D_d$  = density of each VOC-solvent added to coatings (kilograms per liter).

$D_r$  = density of VOC-solvent recovered by an emission control device (kilograms per liter).

$E$  = VOC destruction efficiency of the control device (fraction).

$F$  = the proportion of total VOC's emitted by an affected facility that enters the control device (fraction).

$G$  = volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter).

$L_c$  = the volume of each coating consumed, as received (liters).

$L_d$  = the volume of each VOC-solvent added to coatings (liters).

$L_r$  = the volume of VOC-solvent recovered by an emission control device (liters).

$L_s$  = the volume of coating solids consumed (liters).

$M_d$  = the mass of VOC-solvent added to coatings (kilograms).

$M_o$  = the mass of VOC's in coatings consumed, as received (kilograms).

$M_r$  = the mass of VOC's recovered by an emission control device (kilograms).

$N$  = the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter).

$Q_a$  = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).

$Q_b$  = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).

$Q_f$  = the volumetric flow rate of each gas stream emitted directly to the atmosphere (dry standard cubic meters per hour).

$R$  = the overall VOC emission reduction achieved for an affected facility (fraction).

$S$  = the calculated monthly allowable emission limit (kilograms of VOC per liter of coating solids applied).

$V_s$  = the proportion of solids in each coating, as received (fraction by volume).

$W_o$  = the proportion of VOC's in each coating, as received (fraction by weight).

**§ 60.462 Standards for volatile organic compounds.**

(a) On and after the date on which § 60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than:

(1) 0.28 kilogram VOC per liter (kg VOC/ l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s); or

(2) 0.14 kg VOC/ l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(3) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(4) A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/ l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

**§ 60.463 Performance test and compliance provisions.**

(a) Section 60.8(d) and (f) do not apply to the performance test.

(b) The owner or operator of an affected facility shall conduct an initial performance test as required under § 60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.

(c) The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/ l of coating solids applied.

(1) An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under § 60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator.

(i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of this section. The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

(A) Calculate the mass of VOC's used ( $M_o + M_d$ ) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 1}$$

( $\sum L_{dj} D_{dj}$  will be 0 if no VOC solvent is added to the coatings, as received)

where

n is the number of different coatings used during the calendar month, and

m is the number of different VOC solvents added to coatings used during the calendar month.

(B) Calculate the total volume of coating solids used ( $L_s$ ) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n V_{s_i} L_{s_i} \quad \text{Equation 2}$$

Where:

n is the number of different coatings used during the calendar month.

(C) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied ( $G$ ) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \quad \text{Equation 3}$$

(ii) Calculate the volume-weighted average of VOC emissions to the atmosphere ( $N$ ) during the calendar month for each affected facility by the following equation:

$$N = G \quad \text{Equation 4}$$

(iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied ( $N$ ) is equal to or less than 0.28 kg/ l, the affected facility is in compliance.

(iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/ l of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

(2) An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under § 60.462(a) (2) or (3).

(i) Determine the overall reduction efficiency ( $R$ ) for the capture system and control device.

For the initial performance test, the overall reduction efficiency ( $R$ ) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency ( $R$ ) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c)(2)(i) (A), (B), and (C) of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.

(A) Determine the fraction ( $F$ ) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^j C_{oi} Q_{oi}}{\sum_{i=1}^j C_{oi} Q_{oi} + \sum_{i=1}^k C_{oi} Q_{oi}}$$

Equation 5

Where:

$l$  is the number of gas streams entering the control device, and

$p$  is the number of gas streams emitted directly to the atmosphere.

(B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^l Q_{in} C_{in} - \sum_{j=1}^p Q_{out} C_{out}}{\sum_{i=1}^l Q_{in} C_{in}}$$

Equation 6

Where:

$n$  is the number of gas streams entering the control device, and

$m$  is the number of gas streams leaving the control device and entering the atmosphere.

The owner or operator of the affected facility shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in § 60.466. The owner or operator of the affected facility shall construct a temporary enclosure around the coating applicator and flashoff area during the performance test for the purpose of evaluating the capture efficiency of the system. The enclosure must be maintained at a negative pressure to ensure that all VOC emissions are measurable. If a permanent enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is adequately containing VOC emissions, no additional enclosure is required for the performance test.

(C) Determine overall reduction efficiency (R) using the following equation:

$$R = EF \quad \text{Equation 7}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows.

(ii) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section.

(iii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G(1 - R) \quad \text{Equation 8}$$

(iv) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/ l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

(3) An owner or operator shall use the following procedure for each affected facility that uses a control device that recovers the VOC's (e.g., carbon adsorber) to comply with the applicable emission limit specified under § 60.462(a) (2) or (3).

(i) Calculate the total mass of VOC's consumed ( $M_o + M_d$ ) during each calendar month for each affected facility using equation (1).

(ii) Calculate the total mass of VOC's recovered ( $M_r$ ) during each calendar month using the following equation:

$$M_r = L_r D_r \quad \text{Equation 9}$$

(iii) Calculate the overall reduction efficiency of the control device (R) for each calendar month for each affected facility using the following equation:

$$R = \frac{M_r}{M_o + M_d} \quad \text{Equation 10}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) must be computed as follows.

(iv) Calculate the total volume of coating solids consumed ( $L_s$ ) and the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (B) and (C) of this section.

(v) Calculate the volume-weighted average mass of VOC's emitted to the atmosphere (N) for each calendar month for each affected facility using equation (8).

(vi) If the weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

(4) An owner or operator shall use the following procedures for each affected facility that intermittently uses a capture system and a control device to comply with the emission limit specified in § 60.462(a)(4).

(i) Calculate the total volume of coating solids applied without the control device in operation ( $L_{sn}$ ) during each calendar month for each affected facility using the following equation:

$$L_{sn} = \sum_{i=1}^n V_{si} L_{ci} \quad \text{Equation 11}$$

Where:

n is the number of coatings used during the calendar month without the control device in operation.

(ii) Calculate the total volume of coating solids applied with the control device in operation ( $L_{sc}$ ) during each calendar month for each affected facility using the following equation:

$$L_{sc} = \sum_{i=1}^n V_{si} L_{ci} \quad \text{Equation 12}$$

Where:

n is the number of coatings used during the calendar month with the control device in operation.

(iii) Calculate the mass of VOC's used without the control device in operation ( $M_{on} + M_{dn}$ ) during each calendar month for each affected facility using the following equation:

$$M_{on} + M_{dn} + \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 13}$$

Where:

n is the number of different coatings used without the control device in operation during the calendar month, and

m is the number of different VOC-solvents added to coatings used without the control device in operation during the calendar month.

(iv) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied without the control device in operation ( $G_n$ ) during each calendar month for each affected facility using the following equation:

$$G_n = \frac{M_{on} + M_{dn}}{L_{sn}} \quad \text{Equation 14}$$

(v) Calculate the mass of VOC's used with the control device in operation ( $M_{oc} + M_{dc}$ ) during each calendar month for each affected facility using the following equation:

$$M_{oc} + M_{dc} = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 15}$$

Where:

n is the number of different coatings used with the control device in operation during the calendar month, and

m is the number of different VOC-solvents added to coatings used with the control device in operation during the calendar month.

(vi) Calculate the volume-weighted average of the total mass of VOC's used per unit volume of coating solids applied with the control device in operation ( $G_c$ ) during each calendar month for each affected facility using the following equation:

$$G_c = \frac{M_{oc} + M_{dc}}{L_{sn}} \quad \text{Equation 16}$$

(vii) Determine the overall reduction efficiency (R) for the capture system and control device using the procedures in paragraphs (c)(2)(i) (A), (B), and (C) or paragraphs (c)(3) (i), (ii), and (iii) of this section, whichever is applicable.

(viii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month for each affected facility using the following equation:

$$N = \frac{G_n L_{sn} + G_c L_{sc} (1 - R)}{L_{sn} + L_{sc}} \quad \text{Equation 17}$$

(ix) Calculate the emission limit(s) for each calendar month for each affected facility using the following equation:

$$S = \frac{0.28 L_{sn} + 0.1 G_c L_{sc}}{L_{sn} + L_{sc}}$$

or

$$\frac{0.28 L_{sn} + 0.14 L_{sc}}{L_{sn} + L_{sc}} \quad \text{Equation 18}$$

whichever is greater.

(x) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to the calculated emission limit (S) for the calendar month, the affected facility is in compliance. Each monthly calculation is a performance test.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

#### § 60.464 Monitoring of emissions and operations.

(a) Where compliance with the numerical limit specified in § 60.462(a) (1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in § 60.463.

(b) Where compliance with the limit specified in § 60.462(a)(4) is achieved through the intermittent use of emission control devices, the owner or operator shall compute and record for each affected facility the average VOC content of coatings applied during each calendar month according to the equations provided in § 60.463.

(c) If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with § 60.462(a)(2), (3), or (4). This device shall have an accuracy of  $\pm 2.5$  °C. or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with § 60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by § 60.8. The records required by § 60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of  $\pm 2.5$  °C. or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet temperature falls more than 28 °C (50 °F) below the temperature at which compliance with § 60.462(a)(2), (3), or (4) was demonstrated

during the most recent measurement of incinerator efficiency required by § 60.8. The records required by § 60.7 shall identify each such occurrence and its duration.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

#### **§ 60.465 Reporting and recordkeeping requirements.**

(a) Where compliance with the numerical limit specified in § 60.462(a) (1), (2), or (4) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of this subpart shall include in the initial compliance report required by § 60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with § 60.462(a)(4) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation.

(b) Where compliance with § 60.462(a)(2), (3), or (4) is achieved through the use of an emission control device that destroys VOC's, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by § 60.8:

(1) The overall VOC destruction rate used to attain compliance with § 60.462(a)(2), (3), or (4) and the calculated emission limit used to attain compliance with § 60.462(a)(4); and

(2) The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with § 60.462(a)(2), (3), or (4).

(c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under § 60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(d) The owner or operator of each affected facility shall also submit reports at the frequency specified in § 60.7(c) when the incinerator temperature drops as defined under § 60.464(c). If no such periods occur, the owner or operator shall state this in the report.

(e) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

[47 FR 49612, Nov. 1, 1982, as amended at 55 FR 51383, Dec. 13, 1990; 56 FR 20497, May 3, 1991; 65 FR 61761, Oct. 17, 2000]

#### **§ 60.466 Test methods and procedures.**

(a) The reference methods in appendix A to this part, except as provided under § 60.8(b), shall be used to determine compliance with § 60.462 as follows:

(1) Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24,

is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

(2) Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the control device on each stack equipped with an emission control device and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere;

(3) Method 1 for sample and velocity traverses;

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

(5) Method 3 for gas analysis; and

(6) Method 4 for stack gas moisture.

(b) For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

(c) For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(d) The Administrator will approve testing of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks.

[47 FR 49612, Nov. 1, 1982, as amended at 51 FR 22938, June 24, 1986; 65 FR 61761, Oct. 17, 2000]

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

**Attachment B**

**Title 40: Protection of Environment**

PART 63 - National Emission Standards for Hazardous Air Pollutants (NESHAP)

**Subpart SSSS** - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

Source: 67 FR 39812, June 10, 2002, unless otherwise noted.

**What This Subpart Covers**

**§ 63.5080 What is in this subpart?**

This subpart describes the actions you must take to reduce emissions of hazardous air pollutants (HAP) if you own or operate a facility that performs metal coil surface coating operations and is a major source of HAP. This subpart establishes emission standards and states what you must do to comply. Certain requirements apply to all who must comply with the subpart; others depend on the means you use to comply with an emission standard.

**§ 63.5090 Does this subpart apply to me?**

(a) The provisions of this subpart apply to each facility that is a major source of HAP, as defined in § 63.2, at which a coil coating line is operated, except as provided in paragraph (b) of this section.

(b) This subpart does not apply to any coil coating line that meets the criteria of paragraph (b)(1) or (2) of this section.

(1) A coil coating line that is part of research or laboratory equipment.

(2) A coil coating line on which at least 85 percent of the metal coil coated, based on surface area, is less than 0.15 millimeter (0.006 inch) thick, except as provided in paragraph (c) of this section.

(c) If you operate a coating line subject to subpart JJJJ of this part that also meets the criteria in either paragraph (c)(1) or (2) of this section, and you choose to comply with the requirements of this subpart, then such compliance constitutes compliance with subpart JJJJ. The coating line for which you choose this option is, therefore, included in the affected source for this subpart as defined in § 63.5110 and shall not be included in the affected source for subpart JJJJ as defined in § 63.3300.

(1) The coating line is used to coat metal coil of thicknesses both less than and greater than or equal to 0.15 millimeter (0.006 inch) thick, regardless of the percentage of surface area of each thickness coated.

(2) The coating line is used to coat only metal coil that is less than 0.15 millimeter (0.006 inch) thick and the coating line is controlled by a common control device that also receives organic HAP emissions from a coil coating line that is subject to the requirements of this subpart.

(d) Each coil coating line that does not comply with the provisions of this subpart because it meets the criteria in paragraph (b)(2) of this section, that for any rolling 12-month period fails to meet the criteria in paragraph (b)(2) would from that point forward become subject to the provisions of this subpart. After becoming subject to the provisions of this subpart, the coil coating line would no longer be eligible to use the criteria of paragraph (b)(2) of this section, even if in subsequent 12-month periods at least 85 percent of the metal coil coated, based on surface area, is less than 0.15 millimeter (0.006 inch) thick.

**§ 63.5100 Which of my emissions sources are affected by this subpart?**

The affected source subject to this subpart is the collection of all of the coil coating lines at your facility.

**§ 63.5110 What special definitions are used in this subpart?**

All terms used in this subpart that are not defined in this section have the meaning given to them in the Clean Air Act (CAA) and in subpart A of this part.

*Always-controlled work station* means a work station associated with a curing oven from which the curing oven exhaust is delivered to a control device with no provision for the oven exhaust to bypass the control device. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

*Capture efficiency* means the fraction of all organic HAP emissions generated by a process that is delivered to a control device, expressed as a percentage.

*Capture system* means a hood, enclosed room, or other means of collecting organic HAP emissions and conveying them to a control device.

*Car-seal* means a seal that is placed on a device that is used to change the position of a valve or damper (e.g., from open to closed) in such a way that the position of the valve or damper cannot be changed without breaking the seal.

*Coating* means material applied onto or impregnated into a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealants, inks, adhesives, maskants, and temporary coatings. Decorative, protective, or functional materials that consist only of solvents, protective oils, acids, bases, or any combination of these substances are not considered coatings for the purposes of this subpart.

*Coating material* means the coating and other products (e.g., a catalyst and resin in multi-component coatings) combined to make a single material at the coating facility that is applied to metal coil. For the purposes of this subpart, an organic solvent that is used to thin a coating prior to application to the metal coil is considered a coating material.

*Coil coating line* means a process and the collection of equipment used to apply an organic coating to the surface of metal coil. A coil coating line includes a web unwind or feed section, a series of one or more work stations, any associated curing oven, wet section, and quench station. A coil coating line does not include ancillary operations such as mixing/thinning, cleaning, wastewater treatment, and storage of coating material.

*Control device* means a device such as a solvent recovery device or oxidizer which reduces the organic HAP in an exhaust gas by recovery or by destruction.

*Control device efficiency* means the ratio of organic HAP emissions recovered or destroyed by a control device to the total organic HAP emissions that are introduced into the control device, expressed as a percentage.

*Curing oven* means the device that uses heat or radiation to dry or cure the coating material applied to the metal coil.

*Day* means a 24-consecutive-hour period.

*Deviation* means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source:

(1) Fails to meet any requirement or obligation established by this subpart including, but not limited to, any emission limitation (including any operating limit) or work practice standard;

(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or

(3) Fails to meet any emission limitation (including any operating limit) or work practice standard in this subpart during start-up, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

*Existing affected source* means an affected source the construction of which commenced on or before July 18, 2000, and it has not subsequently undergone reconstruction as defined in § 63.2.

*Facility* means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

*Flexible packaging* means any package or part of a package the shape of which can be readily changed. Flexible packaging includes but is not limited to bags, pouches, labels, liners and wraps utilizing paper, plastic, film, aluminum foil, metalized or coated paper or film, or any combination of these materials.

*HAP applied* means the organic HAP content of all coating materials applied to a substrate by a coil coating line.

*Intermittently-controllable work station* means a work station associated with a curing oven with provisions for the curing oven exhaust to be delivered to a control device or diverted from a control device through a bypass line, depending on the position of a valve or damper. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

*Metal coil* means a continuous metal strip that is at least 0.15 millimeter (0.006 inch) thick, which is packaged in a roll or coil prior to coating. After coating, it may or may not be rewound into a roll or coil. Metal coil does not include metal webs that are coated for use in flexible packaging.

*Month* means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

*Never-controlled work station* means a work station which is not equipped with provisions by which any emissions, including those in the exhaust from any associated curing oven, may be delivered to a control device.

*New affected source* means an affected source the construction or reconstruction of which commenced after July 18, 2000.

*Overall organic HAP control efficiency* means the total efficiency of a control system, determined either by:

(1) The product of the capture efficiency as determined in accordance with the requirements of § 63.5160(e) and the control device efficiency as determined in accordance with the requirements of § 63.5160(a)(1)(i) and (ii) or § 63.5160(d); or

(2) A liquid-liquid material balance in accordance with the requirements of § 63.5170(e)(1).

*Permanent total enclosure (PTE)* means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51 for a PTE, and that directs all the exhaust gases from the enclosure to a control device.

*Protective oil* means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes but is not limited to lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

*Research or laboratory equipment* means any equipment for which the primary purpose is to conduct research and development into new processes and products, where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

*Temporary total enclosure (TTE)* means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source, as defined in Method 204 of 40 CFR part 51, appendix M.

*Work station* means a unit on a coil coating line where coating material is deposited onto the metal coil substrate.

## **Emission Standards and Compliance Dates**

### **§ 63.5120 What emission standards must I meet?**

(a) Each coil coating affected source must limit organic HAP emissions to the level specified in paragraph (a)(1), (2), or (3) of this section:

(1) No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or

(2) No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or

(3) If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

(b) You must demonstrate compliance with one of these standards by following the applicable procedures in § 63.5170.

### **§ 63.5121 What operating limits must I meet?**

(a) Except as provided in paragraph (b) of this section, for any coil coating line for which you use an add-on control device, unless you use a solvent recovery system and conduct a liquid-liquid material balance according to § 63.5170(e)(1), you must meet the applicable operating limits specified in Table 1 to this subpart. You must establish the operating limits during the performance test according to the requirements in § 63.5160(d)(3). You must meet the operating limits at all times after you establish them.

(b) If you use an add-on control device other than those listed in Table 1 to this subpart, or wish to monitor an alternative parameter and comply with a different operating limit, you must apply to the Administrator for approval of alternative monitoring under § 63.8(f).

### **§ 63.5130 When must I comply?**

(a) For an existing affected source, the compliance date is 3 years after June 10, 2002.

(b) If you own or operate a new affected source subject to the provisions of this subpart, you must comply immediately upon start-up of the affected source, or by June 10, 2002, whichever is later.

(c) Affected sources which have undergone reconstruction are subject to the requirements for new affected sources.

(d) The initial compliance period begins on the applicable compliance date specified in paragraph (a) or (b) of this section and ends on the last day of the 12th month following the compliance date. If the compliance date falls on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months.

(e) For the purpose of demonstrating continuous compliance, a compliance period consists of 12 months. Each month after the end of the initial compliance period described in paragraph (d) of this section is the end of a compliance period consisting of that month and the preceding 11 months.

**General Requirements for Compliance with the Emission Standards and for Monitoring and Performance Tests**

**§ 63.5140 What general requirements must I meet to comply with the standards?**

(a) You must be in compliance with the standards in this subpart at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with this subpart. If you are complying with the emission standards of this subpart without the use of a capture system and control device, you must be in compliance with the standards at all times, including periods of start-up, shutdown, and malfunction.

(b) Table 2 of this subpart provides cross references to subpart A of this part, indicating the applicability of the General Provisions requirements to this subpart.

**§ 63.5150 If I use a control device to comply with the emission standards, what monitoring must I do?**

**TABLE 1 TO § 63.5150—CONTROL DEVICE MONITORING REQUIREMENTS INDEX**

If you operate a coil coating line and have the following:	Then you must:
1. Control device	Monitor control device operating parameters (§ 63.5150(a)(3)).
2. Capture system	Monitor capture system operating parameters (§ 63.5150(a)(4)).
3. Intermittently controllable work station	Monitor parameters related to possible exhaust flow through any bypass to a control device (§ 63.5150(a)(1)).
4. Continuous emission monitors	Operate continuous emission monitors and perform a quarterly audit (§ 63.5150(a)(2)).

(a) To demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device required to comply with § 63.5120 following the date on which the initial performance test of the capture system and control device is completed. You must install and operate the monitoring equipment as specified in paragraphs (a)(1) through (4) of this section.

(1) *Bypass monitoring.* If you operate coil coating lines with intermittently-controllable work stations, you must follow at least one of the procedures in paragraphs (a)(1)(i) through (iv) of this section for each curing oven associated with these work stations to monitor for potential bypass of the control device:

(i) *Flow control position indicator.* Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that provides a record indicating whether the exhaust stream from the curing oven is directed to the control device or is diverted from the control device. The time and flow control position must be recorded at least once per hour, as well as every time

the flow direction is changed. The flow control position indicator must be installed at the entrance to any bypass line that could divert the exhaust stream away from the control device to the atmosphere.

(ii) *Car-seal or lock-and-key valve closures.* Secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration when the control device is in operation; a visual inspection of the seal or closure mechanism will be performed at least once every month to ensure that the valve or damper is maintained in the closed position, and the exhaust stream is not diverted through the bypass line.

(iii) *Valve closure continuous monitoring.* Ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position when the control device is in operation. The monitoring system must be inspected at least once every month to verify that the monitor will indicate valve position.

(iv) *Automatic shutdown system.* Use an automatic shutdown system in which the coil coating line is stopped when flow is diverted away from the control device to any bypass line when the control device is in operation. The automatic shutdown system must be inspected at least once every month to verify that it will detect diversions of flow and shut down operations.

(2) *Continuous emission monitoring system (CEMS).* If you are demonstrating continuous compliance with the standards in § 63.5120(a)(1) or (2) through continuous emission monitoring of a control device, you must install, calibrate, operate, and maintain continuous emission monitors to measure the total organic volatile matter concentration at both the control device inlet and outlet, and you must continuously monitor flow rate. If you are demonstrating continuous compliance with the outlet organic HAP concentration limit in § 63.5120(a)(3), you must install, calibrate, operate, and maintain a continuous emission monitor to measure the total organic volatile matter concentration at the control device outlet.

(i) All CEMS must comply with performance specification 8 or 9 of 40 CFR part 60, appendix B, as appropriate for the detection principle you choose. The requirements of 40 CFR part 60, procedure 1, appendix F must also be followed. In conducting the quarterly audits of the monitors as required by procedure 1, appendix F, you must use compounds representative of the gaseous emission stream being controlled.

(ii) As specified in § 63.8(c)(4)(ii), each CEMS and each flow rate monitor must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. Information which must be determined for recordkeeping purposes, as required by § 63.5190(a)(1)(i) includes:

- (A) The hourly average of all recorded readings;
- (B) The daily average of all recorded readings for each operating day; and
- (C) The monthly average for each month during the semiannual reporting period.

(3) *Temperature monitoring of oxidizers.* If you are complying with the requirements of the standards in § 63.5120 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter, you must comply with paragraphs (a)(3)(i) through (iii) of this section.

(i) Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment either if you choose not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of  $\pm 1$  percent of the temperature being monitored in degrees Celsius, or  $\pm 1$  °Celsius, whichever is greater.

(ii) For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to § 63.5160(d)(3)(i), you must install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.

(iii) For a catalytic oxidizer, if you are demonstrating continuous compliance with the operating limit established according to § 63.5160(d)(3)(ii)(A) and (B), then you must install the thermocouples or temperature sensors in the vent stream at the nearest feasible point to the inlet and outlet of the catalyst bed. Calculate the temperature difference across the catalyst. If you are demonstrating continuous compliance with the operating limit established according to § 63.5160(d)(3)(ii)(C) and (D), then you must install the thermocouple or temperature sensor in the vent stream at the nearest feasible point to the inlet of the catalyst bed.

(4) *Capture system monitoring.* If you are complying with the requirements of the standards in § 63.5120 through the use of a capture system and control device, you must develop a capture system monitoring plan containing the information specified in paragraphs (a)(4)(i) and (ii) of this section. You must monitor the capture system in accordance with paragraph (a)(4)(iii) of this section. You must make the monitoring plan available for inspection by the permitting authority upon request.

(i) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

(ii) The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in § 63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.

(iii) You must conduct monitoring in accordance with the plan.

(b) Any deviation from the required operating parameters which are monitored in accordance with paragraphs (a)(3) and (4) of this section, unless otherwise excused, will be considered a deviation from the operating limit.

**§ 63.5160 What performance tests must I complete?**

**TABLE 1 TO § 63.5160—REQUIRED PERFORMANCE TESTING SUMMARY**

<b>If you control HAP on your coil coating line by:</b>	<b>You must:</b>
1. Limiting HAP or Volatile matter content of coatings	Determine the HAP or volatile matter and solids content of coating materials according to the procedures in § 63.5160(b) and (c).
2. Using a capture system and add-on control device	Conduct a performance test for each capture and control system to determine: (1) the destruction or removal efficiency of each control device according to § 63.5160(d), and (2) the capture efficiency of each capture system according to § 63.5160(e).

(a) If you use a control device to comply with the requirements of § 63.5120, you are not required to conduct a performance test to demonstrate compliance if one or more of the criteria in paragraphs (a)(1) through (3) of this section are met:

(1) The control device is equipped with continuous emission monitors for determining total organic volatile matter concentration, and capture efficiency has been determined in accordance with the requirements of this subpart; and the continuous emission monitors are used to demonstrate continuous compliance in accordance with § 63.5150(a)(2); or

(2) You have received a waiver of performance testing under § 63.7(h); or

(3) The control device is a solvent recovery system and you choose to comply by means of a monthly liquid-liquid material balance.

(b) *Organic HAP content.* You must determine the organic HAP weight fraction of each coating material applied by following one of the procedures in paragraphs (b)(1) through (4) of this section:

(1) *Method 311.* You may test the material in accordance with Method 311 of appendix A of this part. The Method 311 determination may be performed by the manufacturer of the material and the results provided to you. The organic HAP content must be calculated according to the criteria and procedures in paragraphs (b)(1)(i) through (iii) of this section.

(i) Count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds.

(ii) Express the weight fraction of each organic HAP you count according to paragraph (b)(1)(i) of this section as a value truncated to four places after the decimal point (for example, 0.3791).

(iii) Calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763).

(2) *Method 24.* For coatings, you may determine the total volatile matter content as weight fraction of nonaqueous volatile matter and use it as a substitute for organic HAP, using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to you.

(3) *Alternative method.* You may use an alternative test method for determining the organic HAP weight fraction once the Administrator has approved it. You must follow the procedure in § 63.7(f) to submit an alternative test method for approval.

(4) *Formulation data.* You may use formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Formulation data may be provided to you by the manufacturer of the coating material. In the event of any inconsistency between test data obtained with the test methods specified in paragraphs (b)(1) through (3) of this section and formulation data, the test data will govern.

(c) *Solids content.* You must determine the solids content of each coating material applied. You may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see § 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to you. Alternatively, you may rely on formulation data provided by material providers to determine the volume solids.

(d) *Control device destruction or removal efficiency.* If you are using an add-on control device, such as an oxidizer, to comply with the standard in § 63.5120, you must conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet HAP concentration achieved by the oxidizer, according to the methods and procedures in paragraphs (d)(1) and (2) of this section. During the performance test, you must establish the operating limits required by § 63.5121 according to paragraph (d)(3) of this section.

(1) An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously. To establish the outlet organic HAP concentration achieved by the oxidizer, only oxidizer outlet testing must be conducted. The data must be reduced in accordance with the test methods and procedures in paragraphs (d)(1)(i) through (ix).

(i) Method 1 or 1A of 40 CFR part 60, appendix A, is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR part 60, appendix A, is used to determine gas volumetric flow rate.

(iii) Method 3, 3A, or 3B of 40 CFR part 60, appendix A, used for gas analysis to determine dry molecular weight. You may also use as an alternative to Method 3B, the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas, ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses" (incorporated by reference, see § 63.14).

(iv) Method 4 of 40 CFR part 60, appendix A, is used to determine stack gas moisture.

(v) Methods for determining gas volumetric flow rate, dry molecular weight, and stack gas moisture must be performed, as applicable, during each test run, as specified in paragraph (d)(1)(vii) of this section.

(vi) Method 25 or 25A of 40 CFR part 60, appendix A, is used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements, which must be conducted simultaneously. You must submit notification of the intended test method to the Administrator for approval along with notification of the performance test required under § 63.7 (b). You must use Method 25A if any of the conditions described in paragraphs (d)(1)(vi)(A) through (D) of this section apply to the control device.

(A) The control device is not an oxidizer.

(B) The control device is an oxidizer, but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the standards in § 63.5120; or

(C) The control device is an oxidizer, but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or

(D) The control device is an oxidizer, but because of the high efficiency of the control device, the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test must consist of three separate runs, except as provided by § 63.7(e)(3); each run must be conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic matter concentrations and mass flow rates, the average of the results of all runs will apply. If you are demonstrating initial compliance with the outlet organic HAP concentration limit in § 63.5120(a)(3), only the average outlet volatile organic matter concentration must be determined.

(viii) If you are determining the control device destruction or removal efficiency, for each run, determine the volatile organic matter mass flow rates using Equation 1 of this section:

$$M_f = Q_{sd} C_c (12)(0.0416) (10^{-6}) \quad (Eq. 1)$$

Where:

$M_f$  =total organic volatile matter mass flow rate, kg/per hour (h).

$C_c$  =concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or Method 25A, ppmv, dry basis.

$Q_{sd}$  =volumetric flow rate of gases entering or exiting the control device, as determined by Method 2, 2A, 2C, 2D, 2F, or 2G, dry standard cubic meters (dscm)/h.

0.0416=conversion factor for molar volume, kg-moles per cubic meter ( $\text{mol}/\text{m}^3$ ) (@ 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

(ix) For each run, determine the control device destruction or removal efficiency, DRE, using Equation 2 of this section:

$$DRE = \frac{M_{fi} - M_{fo}}{M_{fi}} \times 100 \quad (\text{Eq. 2})$$

Where:

DRE=organic emissions destruction or removal efficiency of the add-on control device, percent.

$M_{fi}$  =organic volatile matter mass flow rate at the inlet to the control device, kg/h.

$M_{fo}$  =organic volatile matter mass flow rate at the outlet of the control device, kg/h.

(x) The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the three test runs and calculated in Equation 2 of this section.

(2) You must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of start-up, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

(3) Operating limits. If you are using a capture system and add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the requirements in § 63.5120, you must establish the applicable operating limits required by § 63.5121. These operating limits apply to each capture system and to each add-on emission control device that is not monitored by CEMS, and you must establish the operating limits during the performance test required by paragraph (d) of this section according to the requirements in paragraphs (d)(3)(i) through (iii) of this section.

(i) *Thermal oxidizer.* If your add-on control device is a thermal oxidizer, establish the operating limits according to paragraphs (d)(3)(i)(A) and (B) of this section.

(A) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

(B) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

(ii) *Catalytic oxidizer.* If your add-on control device is a catalytic oxidizer, establish the operating limits according to either paragraphs (d)(3)(ii)(A) and (B) or paragraphs (d)(3)(ii)(C) and (D) of this section.

(A) During the performance test, you must monitor and record the temperature just before the catalyst bed and the temperature difference across the catalyst bed at least once every 15 minutes during each of the three test runs.

(B) Use the data collected during the performance test to calculate and record the average temperature just before the catalyst bed and the average temperature difference across the catalyst bed maintained during the performance test. These are the minimum operating limits for your catalytic oxidizer.

(C) As an alternative to monitoring the temperature difference across the catalyst bed, you may monitor the temperature at the inlet to the catalyst bed and implement a site-specific inspection and maintenance plan for your catalytic oxidizer as specified in paragraph (d)(3)(ii)(D) of this section. During the performance test, you must monitor and record the temperature just before the catalyst bed at least once every 15 minutes during each of the three test runs. Use the data collected during the performance test to calculate and record the average temperature just before the catalyst bed during the performance test. This is the minimum operating limit for your catalytic oxidizer.

(D) You must develop and implement an inspection and maintenance plan for your catalytic oxidizer(s) for which you elect to monitor according to paragraph (d)(3)(ii)(C) of this section. The plan must address, at a minimum, the elements specified in paragraphs (d)(3)(ii)(D)( 1 ( 3 ) of this section.

( 1 ) Annual sampling and analysis of the catalyst activity ( *i.e.*, conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures.

( 2 ) Monthly inspection of the oxidizer system including the burner assembly and fuel supply lines for problems and,

( 3 ) Annual internal and monthly external visual inspection of the catalyst bed to check for channeling, abrasion, and settling. If problems are found, you must take corrective action consistent with the manufacturer's recommendations and conduct a new performance test to determine destruction efficiency according to § 63.5160.

(iii) *Other types of control devices.* If you use a control device other than an oxidizer or a solvent recovery system for which you choose to comply by means of a monthly liquid-liquid material balance, or wish to monitor an alternative parameter and comply with a different operating limit, you must apply to the Administrator for approval of alternative monitoring under § 63.8(f).

(e) *Capture efficiency.* If you are required to determine capture efficiency to meet the requirements of § 63.5170(e)(2), (f)(1) through (2), (h)(2) through (4), or (i)(2) through (3), you must determine capture efficiency using the procedures in paragraph (e)(1), (2), or (3) of this section, as applicable.

(1) For an enclosure that meets the criteria for a PTE, you may assume it achieves 100 percent capture efficiency. You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR part 51, appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device.

(2) You may determine capture efficiency, CE, according to the protocols for testing with temporary total enclosures that are specified in Method 204A through F of 40 CFR part 51, appendix M. You may exclude never-controlled work stations from such capture efficiency determinations.

(3) As an alternative to the procedures specified in paragraphs (e)(1) and (2) of this section, if you are required to conduct a capture efficiency test, you may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in appendix A to subpart KK of this part. You may exclude never-controlled work stations from such capture efficiency determinations.

## Requirements for Showing Compliance

**§ 63.5170 How do I demonstrate compliance with the standards?**

You must include all coating materials (as defined in § 63.5110) used in the affected source when determining compliance with the applicable emission limit in § 63.5120. To make this determination, you must use at least one of the four compliance options listed in Table 1 of this section. You may apply any of the compliance options to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. You may use different compliance options for different coil coating lines, or at different times on the same line. However, you may not use different compliance options at the same time on the same coil coating line. If you switch between compliance options for any coil coating line or group of lines, you must document this switch as required by § 63.5190(a), and you must report it in the next semiannual compliance report required in § 63.5180.

**TABLE 1 TO § 63.5170—COMPLIANCE DEMONSTRATION REQUIREMENTS INDEX**

<b>If you choose to demonstrate compliance by:</b>	<b>Then you must demonstrate that:</b>
1. Use of “as purchased” compliant coatings	a. Each coating material used during the 12-month compliance period does not exceed 0.046 kg HAP per liter solids, as purchased. Paragraph (a) of this section.
2. Use of “as applied” compliant coatings	a. Each coating material used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Paragraphs (b)(1) of this section; or
	b. Average of all coating materials used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Paragraph (b)(2) of this section.
3. Use of a capture system and control device	Overall organic HAP control efficiency is at least 98 percent on a monthly basis for individual or groups of coil coating lines; or overall organic HAP control efficiency is at least 98 percent during initial performance test and operating limits are achieved continuously for individual coil coating lines; or oxidizer outlet HAP concentration is no greater than 20 ppmv and there is 100 percent capture efficiency during initial performance test and operating limits are achieved continuously for individual coil coating lines. Paragraph (c) of this section.
4. Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate	Average equivalent emission rate does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Paragraph (d) of this section.

(a) *As-purchased compliant coatings.* If you elect to use coatings that individually meet the organic HAP emission limit in § 63.5120(a)(2) as-purchased, to which you will not add HAP during distribution or application, you must demonstrate that each coating material applied during the 12-month compliance period contains no more than 0.046 kg HAP per liter of solids on an as-purchased basis.

(1) Determine the organic HAP content for each coating material in accordance with § 63.5160(b) and the volume solids content in accordance with § 63.5160(c).

(2) Combine these results using Equation 1 of this section and compare the result to the organic HAP emission limit in § 63.5120(a)(2) to demonstrate that each coating material contains no more organic HAP than the limit.

$$H_{siap} = \frac{C_{hi} D_i}{V_{si}} \quad (\text{Eq. 1})$$

Where:

$H_{siap}$  = as-purchased, organic HAP to solids ratio of coating material, i, kg organic HAP/liter solids applied.

$C_{hi}$  = organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

$D_i$  = density of coating material, i, kg/l.

$V_{si}$  = volume fraction of solids in coating, i, l/l.

(b) *As-applied compliant coatings.* If you choose to use “as-applied” compliant coatings, you must demonstrate that the average of each coating material applied during the 12-month compliance period contains no more than 0.046 kg of organic HAP per liter of solids applied in accordance with (b)(1) of this section, or demonstrate that the average of all coating materials applied during the 12-month compliance period contain no more than 0.046 kg of organic HAP per liter of solids applied in accordance with paragraph (b)(2) of this section.

(1) To demonstrate that the average organic HAP content on the basis of solids applied for each coating material applied,  $H_{siyr}$ , is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation 2 of this section:

$$H_{siyr} = \frac{\sum_{y=1}^{12} \left[ V_i D_i C_{ahi} + \sum_{i=1}^q V_j D_j C_{hij} \right]}{\sum_{y=1}^{12} V_i V_{si}} \quad (\text{Eq. 2})$$

Where:

$H_{siyr}$  = average for the 12-month compliance period, as-applied, organic HAP to solids ratio of material, i, kg organic HAP/liter solids applied.

$V_i$  = volume of coating material, i, l.

$D_i$  = density of coating material, i, kg/l.

$C_{ahi}$  = monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

$V_j$  = volume of solvent, j, l.

$D_j$  = density of solvent, j, kg/l.

$C_{hij}$  = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

$V_{si}$  = volume fraction of solids in coating, i, l/l.

y = identifier for months.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(2) To demonstrate that the average organic HAP content on the basis of solids applied,  $H_{S_{yr}}$ , of all coating materials applied is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation 3 of this section:

$$H_{S_{yr}} = \frac{\sum_{y=1}^{12} \left[ \sum_{i=1}^p V_i D_i C_{ahi} + \sum_{j=1}^q V_j D_j C_{hij} \right]}{\sum_{y=1}^{12} \left[ \sum_{i=1}^p V_i V_s \right]} \quad (\text{Eq. 3})$$

Where:

$H_{S_{yr}}$  = average for the 12-month compliance period, as-applied, organic HAP to solids ratio of all materials applied, kg organic HAP/liter solids applied.

$V_i$  = volume of coating material, i, l.

$D_i$  = density of coating material, i, kg/l.

$C_{ahi}$  = monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

$V_j$  = volume of solvent, j, l.

$D_j$  = density of solvent, j, kg/l.

$C_{hij}$  = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

$V_{si}$  = volume fraction of solids in coating, i, l/l.

p = number of different coating materials applied in a month.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

y = identifier for months.

(c) *Capture and control to reduce emissions to no more than the allowable limit.* If you use one or more capture systems and one or more control devices and demonstrate an average overall organic HAP control efficiency of at least 98 percent for each month to comply with § 63.5120(a)(1); or operate a capture system and oxidizer so that the capture efficiency is 100 percent and the oxidizer outlet HAP concentration is no greater than 20 ppmv on a dry basis to comply with § 63.5120(a)(3), you must follow one of the procedures in paragraphs (c)(1) through (4) of this section. Alternatively, you may demonstrate compliance for an individual coil coating line by operating its capture system and control device and continuous parameter monitoring system according to the procedures in paragraph (i) of this section.

(1) If the affected source uses one compliance procedure to limit organic HAP emissions to the level specified in § 63.5120(a)(1) or (2) and has only always-controlled work stations, then you must demonstrate compliance with the provisions of paragraph (e) of this section when emissions from the affected source are controlled by one or more solvent recovery devices.

(2) If the affected source uses one compliance procedure to limit organic HAP emissions to the level specified in § 63.5120(a)(1) or (2) and has only always-controlled work stations, then you must demonstrate compliance with the provisions of paragraph (f) of this section when emissions are controlled by one or more oxidizers.

(3) If the affected source operates both solvent recovery and oxidizer control devices, one or more never-controlled work stations, or one or more intermittently-controllable work stations, or uses more than one compliance procedure, then you must demonstrate compliance with the provisions of paragraph (g) of this section.

(4) The method of limiting organic HAP emissions to the level specified in § 63.5120(a)(3) is the installation and operation of a PTE around each work station and associated curing oven in the coating line and the ventilation of all organic HAP emissions from each PTE to an oxidizer with an outlet organic HAP concentration of no greater than 20 ppmv on a dry basis. An enclosure that meets the requirements in § 63.5160(e)(1) is considered a PTE. Initial compliance of the oxidizer with the outlet organic HAP concentration limit is demonstrated either through continuous emission monitoring according to paragraph (c)(4)(ii) of this section or through performance tests using the procedure in § 63.5160(d). If this method is selected, you must meet the requirements of paragraph (c)(4)(i) of this section to demonstrate continuing achievement of 100 percent capture of organic HAP emissions and either paragraph (c)(4)(ii) or paragraph (c)(4)(iii) of this section, respectively, to demonstrate continuous compliance with the oxidizer outlet organic HAP concentration limit through continuous emission monitoring or continuous operating parameter monitoring:

(i) Whenever a work station is operated, continuously monitor the capture system operating parameter established in accordance with § 63.5150(a)(4).

(ii) To demonstrate that the value of the exhaust gas organic HAP concentration at the outlet of the oxidizer is no greater than 20 ppmv, on a dry basis, install, calibrate, operate, and maintain CEMS according to the requirements of § 63.5150(a)(2).

(iii) To demonstrate continuous compliance with operating limits established in accordance with § 63.5150(a)(3), whenever a work station is operated, continuously monitor the applicable oxidizer operating parameter.

(d) *Capture and control to achieve the emission rate limit.* If you use one or more capture systems and one or more control devices and limit the organic HAP emission rate to no more than 0.046 kg organic HAP emitted per liter of solids applied on a 12-month average as-applied basis, then you must follow one of the procedures in paragraphs (d)(1) through (3) of this section.

(1) If you use one or more solvent recovery devices, you must demonstrate compliance with the provisions in paragraph (e) of this section.

(2) If you use one or more oxidizers, you must demonstrate compliance with the provisions in paragraph (f) of this section.

(3) If you use both solvent recovery devices and oxidizers, or operate one or more never-controlled work stations or one or more intermittently controllable work stations, you must demonstrate compliance with the provisions in paragraph (g) of this section.

(e) *Use of solvent recovery to demonstrate compliance.* If you use one or more solvent recovery devices to control emissions from always-controlled work stations, you must show compliance by following the procedures in either paragraph (e)(1) or (2) of this section:

(1) *Liquid-liquid material balance.* Perform a liquid-liquid material balance for each month as specified in paragraphs (e)(1)(i) through (vi) of this section and use Equations 4 through 6 of this section to convert the data to units of this standard. All determinations of quantity of coating and composition of coating must be made at a time and location in the process after all ingredients (including any dilution solvent) have been added to the coating, or appropriate adjustments must be made to account for any ingredients added after the amount of coating has been determined.

(i) Measure the mass of each coating material applied on the work station or group of work stations controlled by one or more solvent recovery devices during the month.

(ii) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the organic HAP content of each coating material applied during the month following the procedure in § 63.5160(b).

(iii) Determine the volatile matter content of each coating material applied during the month following the procedure in § 63.5160(c).

(iv) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the solids content of each coating material applied during the month following the procedure in § 63.5160(c).

(v) For each solvent recovery device used to comply with § 63.5120(a), install, calibrate, maintain, and operate according to the manufacturer's specifications, a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device must be initially certified by the manufacturer to be accurate to within  $\pm 2.0$  percent.

(vi) For each solvent recovery device used to comply with § 63.5120(a), measure the amount of volatile matter recovered for the month.

(vii) *Recovery efficiency,  $R_v$* . Calculate the volatile organic matter collection and recovery efficiency,  $R_v$ , using Equation 4 of this section:

$$R_v = 100 \frac{\sum_{k=1}^s M_{kvr}}{\sum_{i=1}^p M_i C_{vi} + \sum_{j=1}^q M_j} \quad (\text{Eq. 4})$$

Where:

$R_v$  = organic volatile matter collection and recovery efficiency, percent.

$M_{kvr}$  = mass of volatile matter recovered in a month by solvent recovery device, k, kg.

$M_i$  = mass of coating material, i, applied in a month, kg.

$C_{vi}$  = volatile matter content of coating material, i, expressed as a weight fraction, kg/kg.

$M_j$  = mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material (excluding  $H_2O$ ), j, applied in a month, kg.

p = number of different coating materials applied in a month.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

s = number of solvent recovery devices used to comply with the standard of § 63.5120 of this subpart, in the facility.

(viii) *Organic HAP emitted,  $H_e$* . Calculate the mass of organic HAP emitted during the month,  $H_e$ , using Equation 5 of this section:

$$H_e = \left[ 1 - \frac{R_v}{100} \right] \left[ \sum_{i=1}^p \left( C_{ki} M_i + \sum_{j=1}^q C_{kij} M_{ij} \right) \right] \quad (Eq. 5)$$

Where:

$H_e$  = total monthly organic HAP emitted, kg.

$R_v$  = organic volatile matter collection and recovery efficiency, percent.

$C_{ki}$  = organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

$M_i$  = mass of coating material, i, applied in a month, kg.

$C_{kij}$  = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

$M_{ij}$  = mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material, j, added to solids-containing coating material, i, in a month, kg.

p = number of different coating materials applied in a month.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(ix) *Organic HAP emission rate based on solids applied for the 12-month compliance period,  $L_{ANNUAL}$* . Calculate the organic HAP emission rate based on solids applied for the 12-month compliance period,  $L_{ANNUAL}$ , using Equation 6 of this section:

$$L_{ANNUAL} = \frac{\sum_{y=1}^{12} H_e}{\sum_{y=1}^{12} \left[ \sum_{i=1}^p C_{si} M_i \right]} \quad (Eq. 6)$$

Where:

$L_{ANNUAL}$  = mass organic HAP emitted per volume of solids applied for the 12-month compliance period, kg/liter.

$H_e$  = total monthly organic HAP emitted, kg.

$C_{si}$  = solids content of coating material, i, expressed as liter of solids/kg of material.

$M_i$  = mass of coating material, i, applied in a month, kg.

y = identifier for months.

p = number of different coating materials applied in a month.

(x) *Compare actual performance to performance required by compliance option.* The affected source is in compliance with § 63.5120(a) if it meets the requirement in either paragraph (e)(1)(x)(A) or (B) of this section:

(A) The average volatile organic matter collection and recovery efficiency,  $R_v$ , is 98 percent or greater each month of the 12-month compliance period; or

(B) The organic HAP emission rate based on solids applied for the 12-month compliance period,  $L_{ANNUAL}$ , is 0.046 kg organic HAP per liter solids applied or less.

(2) *Continuous emission monitoring of control device performance.* Use continuous emission monitors to demonstrate recovery efficiency, conduct an initial performance test of capture efficiency and volumetric flow rate, and continuously monitor a site specific operating parameter to ensure that capture efficiency and volumetric flow rate are maintained following the procedures in paragraphs (e)(2)(i) through (xi) of this section:

(i) *Control device destruction or removal efficiency, DRE.* For each control device used to comply with § 63.5120(a), continuously monitor the gas stream entering and exiting the control device to determine the total volatile organic matter mass flow rate (e.g., by determining the concentration of the vent gas in grams per cubic meter and the volumetric flow rate in cubic meters per second, such that the total volatile organic matter mass flow rate in grams per second can be calculated using Equation 1 of § 63.5160, and the percent destruction or removal efficiency, DRE, of the control device can be calculated for each month using Equation 2 of § 63.5160.

(ii) Determine the percent capture efficiency, CE, for each work station in accordance with § 63.5160(e).

(iii) *Capture efficiency monitoring.* Whenever a work station is operated, continuously monitor the operating parameter established in accordance with § 63.5150(a)(4).

(iv) *Control efficiency, R.* Calculate the overall organic HAP control efficiency, R, achieved for each month using Equation 7 of this section:

$$R = 100 \frac{\sum_{A=1}^w \left[ (DRE_k CE_A) \left( \sum_{i=1}^p M_{Ai} C_{vi} + \sum_{j=1}^q M_{Aj} \right) \right]}{\sum_{i=1}^p M_i C_{vi} + \sum_{j=1}^q M_j} \quad (Eq. 7)$$

Where:

R=overall organic HAP control efficiency, percent.

$DRE_k$  =organic volatile matter destruction or removal efficiency of control device, k, percent.

$CE_A$  =organic volatile matter capture efficiency of the capture system for work station, A, percent.

$M_{Ai}$  =mass of coating material, i, applied on work station, A, in a month, kg.

$C_{vi}$  =volatile matter content of coating material, i, expressed as a weight fraction, kg/kg.

$M_{Aj}$  =mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material (including  $H_2O$ ), j, applied on work station, A, in a month, kg.

$M_i$  =mass of coating material, i, applied in a month, kg.

$M_j$  =mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material (excluding  $H_2O$ ), j, applied in a month, kg.

w=number of always-controlled work stations in the facility.

p=number of different coating materials applied in a month.

q=number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(v) If demonstrating compliance with the organic HAP emission rate based on solids applied, measure the mass of each coating material applied on each work station during the month.

(vi) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the organic HAP content of each coating material applied during the month in accordance with § 63.5160(b).

(vii) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the solids content of each coating material applied during the month in accordance with § 63.5160(c).

(viii) If demonstrating compliance with the organic HAP emission rate based on solids applied, calculate the organic HAP emitted during the month,  $H_e$ , for each month using Equation 8 of this section:

$$H_e = \sum_{A=1}^w \left[ \left( 1 - (DRE_k CE_A) \left( \sum_{i=1}^p C_{hi} M_{Ai} + \sum_{j=1}^q C_{hij} M_{Aij} \right) \right) \right] \quad (Eq. 8)$$

Where:

$H_e$  =total monthly organic HAP emitted, kg.

$DRE_k$  =organic volatile matter destruction or removal efficiency of control device, k, percent.

$CE_A$  =organic volatile matter capture efficiency of the capture system for work station, A, percent.

$C_{hi}$  =organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

$M_{Ai}$  =mass of coating material, i, applied on work station, A, in a month, kg.

$C_{hij}$  =organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

$M_{Aij}$  =mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material, j, added to solids-containing coating material, i, applied on work station, A, in a month, kg.

w=number of always-controlled work stations in the facility.

p=number of different coating materials applied in a month.

q=number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(ix) *Organic HAP emission rate based on solids applied for the 12-month compliance period,  $L_{ANNUAL}$ .* Calculate the organic HAP emission rate based on solids applied for the 12-month compliance period,  $L_{ANNUAL}$ , using Equation 6 of this section.

(x) *Compare actual performance to performance required by compliance option.* The affected source is in compliance with § 63.5120(a) if each capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with § 63.5150 for each 3-hour period; and

(A) The overall organic HAP control efficiency, R, is 98 percent or greater for each; or

(B) The organic HAP emission rate based on solids applied for the 12-month compliance period,  $L_{ANNUAL}$ , is 0.046 kg organic HAP per liter solids applied or less.

(f) *Use of oxidation to demonstrate compliance.* If you use one or more oxidizers to control emissions from always controlled work stations, you must follow the procedures in either paragraph (f)(1) or (2) of this section:

(1) *Continuous monitoring of capture system and control device operating parameters.* Demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters as specified in paragraphs (f)(1)(i) through (xi) of this section:

(i) For each oxidizer used to comply with § 63.5120(a), determine the oxidizer destruction or removal efficiency, DRE, using the procedure in § 63.5160(d).

(ii) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with § 63.5150(a)(3).

(iii) Determine the capture system capture efficiency, CE, for each work station in accordance with § 63.5160(e).

(iv) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with § 63.5150(a)(4).

(v) Calculate the overall organic HAP control efficiency, R, achieved using Equation 7 of this section.

(vi) If demonstrating compliance with the organic HAP emission rate based on solids applied, measure the mass of each coating material applied on each work station during the month.

(vii) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the organic HAP content of each coating material applied during the month following the procedure in § 63.5160(b).

(viii) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the solids content of each coating material applied during the month following the procedure in § 63.5160(c).

(ix) Calculate the organic HAP emitted during the month,  $H_e$ , for each month:

(A) For each work station and its associated oxidizer, use Equation 8 of this section.

(B) For periods when the oxidizer has not operated within its established operating limit, the control device efficiency is determined to be zero.

(x) *Organic HAP emission rate based on solids applied for the 12-month compliance period,  $L_{ANNUAL}$ .* If demonstrating compliance with the organic HAP emission rate based on solids applied for the 12-month compliance period, calculate the organic HAP emission rate based on solids applied,  $L_{ANNUAL}$ , for the 12-month compliance period using Equation 6 of this section.

(xi) *Compare actual performance to performance required by compliance option.* The affected source is in compliance with § 63.5120(a) if each oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in § 63.5150(a)(3) for each 3-hour period, and each capture system operating parameter average value is greater than or less than (as appropriate) the operating parameter value established in § 63.5150(a)(4) for each 3-hour period; and the requirement in either paragraph (f)(1)(xi)(A) or (B) of this section is met.

(A) The overall organic HAP control efficiency, R, is 98 percent or greater for each; or

(B) The organic HAP emission rate based on solids applied,  $L_{ANNUAL}$ , is 0.046 kg organic HAP per liter solids applied or less for the 12-month compliance period.

(2) *Continuous emission monitoring of control device performance.* Use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site specific operating parameter to ensure that capture efficiency is maintained. Compliance must be demonstrated in accordance with paragraph (e)(2) of this section.

(g) *Combination of capture and control.* You must demonstrate compliance according to the procedures in paragraphs (g)(1) through (8) of this section if both solvent recovery and oxidizer control devices, one or more never controlled coil coating stations, or one or more intermittently controllable coil coating stations are operated; or more than one compliance procedure is used.

(1) *Solvent recovery system using liquid/liquid material balance compliance demonstration.* For each solvent recovery system used to control one or more work stations for which you choose to comply by means of a liquid-liquid material balance, you must determine the organic HAP emissions each month of the 12-month compliance period for those work stations controlled by that solvent recovery system according to either paragraph (g)(1)(i) or (ii) of this section:

(i) In accordance with paragraphs (e)(1)(i) through (iii) and (e)(1)(v) through (viii) of this section if the work stations controlled by that solvent recovery system are only always-controlled work stations; or

(ii) In accordance with paragraphs (e)(1)(ii) through (iii), (e)(1)(v) through (vi), and (h) of this section if the work stations controlled by that solvent recovery system include one or more never-controlled or intermittently-controllable work stations.

(2) *Solvent recovery system using performance test and continuous monitoring compliance demonstration.* For each solvent recovery system used to control one or more coil coating stations for which you choose to comply by means of an initial test of capture efficiency, continuous emission monitoring of the control device, and continuous monitoring of a capture system operating parameter, each month of the 12-month compliance period you must meet the requirements of paragraphs (g)(2)(i) and (ii) of this section:

(i) For each capture system delivering emissions to that solvent recovery system, monitor an operating parameter established in § 63.5150(a)(4) to ensure that capture system efficiency is maintained; and

(ii) Determine the organic HAP emissions for those work stations served by each capture system delivering emissions to that solvent recovery system according to either paragraph (g)(2)(ii)(A) or (B) of this section:

(A) In accordance with paragraphs (e)(2)(i) through (iii) and (e)(2)(v) through (viii) of this section if the work stations served by that capture system are only always-controlled coil coating stations; or

(B) In accordance with paragraphs (e)(2)(i) through (iii), (e)(2)(v) through (vii), and (h) of this section if the work stations served by that capture system include one or more never-controlled or intermittently-controllable work stations.

(3) *Oxidizer using performance test and continuous monitoring of operating parameters compliance demonstration.* For each oxidizer used to control emissions from one or more work stations for which you choose to demonstrate compliance through performance tests of capture efficiency, control device efficiency, and continuing compliance through continuous monitoring of capture system and control device operating parameters, each month of the 12-month compliance period you must meet the requirements of paragraphs (g)(3)(i) through (iii) of this section:

(i) Monitor an operating parameter established in § 63.5150(a)(3) to ensure that control device destruction or removal efficiency is maintained; and

(ii) For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in § 63.5150(a)(4) to ensure capture efficiency; and

(iii) Determine the organic HAP emissions for those work stations served by each capture system delivering emissions to that oxidizer according to either paragraph (g)(3)(iii)(A) or (B) of this section:

(A) In accordance with paragraphs (f)(1)(i) through (v) and (ix) of this section if the work stations served by that capture system are only always-controlled work stations; or

(B) In accordance with paragraphs (f)(1)(i) through (v), (ix), and (h) of this section if the work stations served by that capture system include one or more never-controlled or intermittently-controllable work stations.

(4) *Oxidizer using continuous emission monitoring compliance demonstration.* For each oxidizer used to control emissions from one or more work stations for which you choose to demonstrate compliance through an initial capture efficiency test, continuous emission monitoring of the control device, and continuous monitoring of a capture system operating parameter, each month of the 12-month compliance period you must meet the requirements in paragraphs (g)(4)(i) and (ii) of this section:

(i) For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in § 63.5150(a)(4) to ensure capture efficiency; and

(ii) Determine the organic HAP emissions for those work stations served by each capture system delivering emissions to that oxidizer according to either paragraph (g)(4)(ii)(A) or (B) of this section:

(A) In accordance with paragraphs (e)(2)(i) through (iii) and (e)(2)(v) through (viii) of this section if the work stations served by that capture system are only always-controlled work stations; or

(B) In accordance with paragraphs (e)(2)(i) through (iii), (e)(2)(v) through (vii), and (h) of this section if the work stations served by that capture system include one or more never-controlled or intermittently-controllable work stations.

(5) *Uncontrolled work stations.* For uncontrolled work stations, each month of the 12-month compliance period you must determine the organic HAP applied on those work stations using Equation 9 of this section. The organic HAP emitted from an uncontrolled work station is equal to the organic HAP applied on that work station:

$$H_m = \sum_{A=1}^x \left( \sum_{i=1}^p C_{hi} M_{Ai} + \sum_{j=1}^q C_{hij} M_{Aij} \right) \quad (\text{Eq. 9})$$

Where:

$H_m$  = facility total monthly organic HAP applied on uncontrolled coil coating stations, kg.

$C_{hi}$  = organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

$M_{Ai}$  = mass of coating material, i, applied on work station, A, in a month, kg.

$C_{hij}$  = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

$M_{Aij}$  = mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material, j, added to solids-containing coating material, i, applied on work station, A, in a month, kg.

x = number of uncontrolled work stations in the facility.

p = number of different coating materials applied in a month.

$q$ =number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(6) If demonstrating compliance with the organic HAP emission rate based on solids applied, each month of the 12-month compliance period you must determine the solids content of each coating material applied during the month following the procedure in § 63.5160(c).

(7) *Organic HAP emitted.* You must determine the organic HAP emissions for the affected source for each 12-month compliance period by summing all monthly organic HAP emissions calculated according to paragraphs (g)(1), (g)(2)(ii), (g)(3)(iii), (g)(4)(ii), and (g)(5) of this section.

(8) *Compare actual performance to performance required by compliance option.* The affected source is in compliance with § 63.5120(a) for the 12-month compliance period if all operating parameters required to be monitored under paragraphs (g)(2) through (4) of this section were maintained at the values established in § 63.5150; and it meets the requirement in either paragraph (g)(8)(i) or (ii) of this section.

(i) The total mass of organic HAP emitted by the affected source was not more than 0.046 kg HAP per liter of solids applied for the 12-month compliance period; or

(ii) The total mass of organic HAP emitted by the affected source was not more than 2 percent of the total mass of organic HAP applied by the affected source each month. You must determine the total mass of organic HAP applied by the affected source in each month of the 12-month compliance period using Equation 9 of this section.

(h) *Organic HAP emissions from intermittently-controllable or never-controlled coil coating stations.* If you have been expressly referenced to this paragraph by paragraphs (g)(1)(ii), (g)(2)(ii)(B), (g)(3)(iii)(B), or (g)(4)(ii)(B) of this section for calculation procedures to determine organic HAP emissions, you must for your intermittently-controllable or never-controlled work stations meet the requirements of paragraphs (h)(1) through (6) of this section:

(1) Determine the sum of the mass of all solids-containing coating materials which are applied on intermittently-controllable work stations in bypass mode, and the mass of all solids-containing coating materials which are applied on never-controlled coil coating stations during each month of the 12-month compliance period,  $M_{B i}$ .

(2) Determine the sum of the mass of all solvents, thinners, reducers, diluents, and other nonsolids-containing coating materials which are applied on intermittently-controllable work stations in bypass mode, and the mass of all solvents, thinners, reducers, diluents and other nonsolids-containing coating materials which are applied on never-controlled work stations during each month of the 12-month compliance period,  $M_{B j}$ .

(3) Determine the sum of the mass of all solids-containing coating materials which are applied on intermittently-controllable work stations in controlled mode, and the mass of all solids-containing coating materials which are applied on always-controlled work stations during each month of the 12-month compliance period,  $M_{C i}$ .

(4) Determine the sum of the mass of all solvents, thinners, reducers, diluents, and other nonsolids-containing coating materials which are applied on intermittently-controllable work stations in controlled mode, and the mass of all solvents, thinners, reducers, diluents, and other nonsolids-containing coating materials which are applied on always-controlled work stations during each month of the 12-month compliance period,  $M_{C j}$ .

(5) *Liquid-liquid material balance calculation of HAP emitted.* For each work station or group of work stations for which you use the provisions of paragraph (g)(1)(ii) of this section, you must calculate the organic HAP emitted during the month using Equation 10 of this section:

$$H_e = \left[ \sum_{i=1}^p M_{\alpha} C_{hi} + \sum_{j=1}^q M_{\zeta} C_{hj} \right] \left[ 1 - \frac{\sum_{k=1}^s M_{kvr}}{\sum_{i=1}^p M_{\alpha} C_{vi} + \sum_{j=1}^q M_{\zeta}} \right] + \left[ \sum_{i=1}^p M_{\beta} C_{ki} + \sum_{j=1}^q M_{\eta} C_{kj} \right] \quad (\text{Eq. 10})$$

Where:

$H_e$  = total monthly organic HAP emitted, kg.

$M_{\alpha}$  = sum of the mass of solids-containing coating material, i, applied on intermittently-controllable work stations operating in controlled mode and the mass of solids-containing coating material, i, applied on always-controlled work stations, in a month, kg.

$C_{hi}$  = organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

$M_{\zeta}$  = sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material, j, applied on intermittently-controllable work stations operating in controlled mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material, j, applied on always-controlled work stations in a month, kg.

$C_{hj}$  = organic HAP content of solvent, j, expressed as a weight fraction, kg/kg.

$M_{kvr}$  = mass of volatile matter recovered in a month by solvent recovery device, k, kg.

$C_{vi}$  = volatile matter content of coating material, i, expressed as a weight fraction, kg/kg.

$M_{\beta}$  = sum of the mass of solids-containing coating material, i, applied on intermittently-controllable work stations operating in bypass mode and the mass of solids-containing coating material, i, applied on never-controlled work stations, in a month, kg.

$M_{\eta}$  = sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material, j, applied on intermittently-controllable work stations operating in bypass mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material, j, applied on never-controlled work stations, in a month, kg.

$p$  = number of different coating materials applied in a month.

$q$  = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

$s$  = number of solvent recovery devices used to comply with the standard of § 63.5120 of this subpart, in the facility.

(6) *Control efficiency calculation of HAP emitted.* For each work station or group of work stations for which you use the provisions of paragraphs (g)(2)(ii)(B), (g)(3)(iii)(B), or (g)(4)(ii)(B) of this section, you must calculate the organic HAP emitted during the month,  $H_e$ , using Equation 11 of this section:

$$e = \sum_{A=1}^w \left[ \left( \sum_{i=1}^p M_{\alpha} C_{hi} + \sum_{j=1}^q M_{\zeta} C_{hj} \right) (1 - DRE_K CE_A) \right] + \left[ \sum_{i=1}^p M_{\beta} C_{ki} + \sum_{j=1}^q M_{\eta} C_{kj} \right] \quad (\text{Eq. 11})$$

Where:

$H_e$  = total monthly organic HAP emitted, kg.

$M_{ci}$  = sum of the mass of solids-containing coating material,  $i$ , applied on intermittently-controllable work stations operating in controlled mode and the mass of solids-containing coating material,  $i$ , applied on always-controlled work stations, in a month, kg.

$C_{hi}$  = organic HAP content of coating material,  $i$ , expressed as a weight-fraction, kg/kg.

$M_{cj}$  = sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material,  $j$ , applied on intermittently-controllable work stations operating in controlled mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material,  $j$ , applied on always-controlled work stations in a month, kg.

$C_{hj}$  = organic HAP content of solvent,  $j$ , expressed as a weight fraction, kg/kg.

$DRE_k$  = organic volatile matter destruction or removal efficiency of control device,  $k$ , percent.

$CE_A$  = organic volatile matter capture efficiency of the capture system for work station,  $A$ , percent.

$M_{Bi}$  = sum of the mass of solids-containing coating material,  $i$ , applied on intermittently-controllable work stations operating in bypass mode and the mass of solids-containing coating material,  $i$ , applied on never-controlled work stations, in a month, kg.

$M_{Bj}$  = sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material,  $j$ , applied on intermittently-controllable work stations operating in bypass mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material,  $j$ , applied on never-controlled work stations, in a month, kg.

$w_i$  = number of intermittently-controllable work stations in the facility.

$p$  = number of different coating materials applied in a month.

$q$  = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(i) *Capture and control system compliance demonstration procedures using a CPMS for a coil coating line.* If you use an add-on control device, to demonstrate initial compliance for each capture system and each control device through performance tests and continuing compliance through continuous monitoring of capture system and control device operating parameters, you must meet the requirements in paragraphs (i)(1) through (3) of this section.

(1) Conduct an initial performance test to determine the control device destruction or removal efficiency, DRE, using the applicable test methods and procedures in § 63.5160(d).

(2) Determine the emission capture efficiency, CE, in accordance with § 63.5160(e).

(3) Whenever a coil coating line is operated, continuously monitor the operating parameters established according to § 63.5150(a)(3) and (4) to ensure capture and control efficiency.

## Reporting and Recordkeeping

### § 63.5180 What reports must I submit?

(a) Submit the reports specified in paragraphs (b) through (i) of this section to the EPA Regional Office that serves the State or territory in which the affected source is located and to the delegated State agency:

(b) You must submit an initial notification required in § 63.9(b).

(1) Submit an initial notification for an existing source no later than 2 years after June 10, 2002.

(2) Submit an initial notification for a new or reconstructed source as required by § 63.9(b).

(3) For the purpose of this subpart, a title V permit application may be used in lieu of the initial notification required under § 63.9(b), provided the same information is contained in the permit application as required by § 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(4) Submit a title V permit application used in lieu of the initial notification required under § 63.9(b) by the same due dates as those specified in paragraphs (b)(1) and (2) of this section for the initial notifications.

(c) You must submit a Notification of Performance Test as specified in §§ 63.7 and 63.9(e) if you are complying with the emission standard using a control device. This notification and the site-specific test plan required under § 63.7(c)(2) must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. You may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

(d) You must submit a Notification of Compliance Status as specified in § 63.9(h). You must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in § 63.5130.

(e) You must submit performance test reports as specified in § 63.10(d)(2) if you are using a control device to comply with the emission standards and you have not obtained a waiver from the performance test requirement.

(f) You must submit start-up, shutdown, and malfunction reports as specified in § 63.10(d)(5) if you use a control device to comply with this subpart.

(1) If your actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in § 63.6(e)(3), you must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the Administrator.

(2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (g) of this section.

(g) You must submit semi-annual compliance reports containing the information specified in paragraphs (g)(1) and (2) of this section.

(1) Compliance report dates.

(i) The first semiannual reporting period begins 1 day after the end of the initial compliance period described in § 63.5130(d) that applies to your affected source and ends 6 months later.

(ii) The first semiannual compliance report must cover the first semiannual reporting period and be postmarked or delivered no later than 30 days after the reporting period ends.

(iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iv) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(v) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (g)(1)(i) through (iv) of this section.

(2) The semi-annual compliance report must contain the following information:

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in Table 1 to § 63.5170 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning dates you used each option.

(v) A statement that there were no deviations from the standards during the reporting period, and that no CEMS were inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

(h) You must submit, for each deviation occurring at an affected source where you are not using CEMS to comply with the standards in this subpart, the semi-annual compliance report containing the information in paragraphs (g)(2)(i) through (iv) of this section and the information in paragraphs (h)(1) through (3) of this section:

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.

(3) Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable).

(i) You must submit, for each deviation occurring at an affected source where you are using CEMS to comply with the standards in this subpart, the semi-annual compliance report containing the information in paragraphs (g)(2)(i) through (iv) of this section, and the information in paragraphs (i)(1) through (12) of this section:

(1) The date and time that each malfunction started and stopped.

(2) The date and time that each CEMS was inoperative, except for zero (low-level) and high-level checks.

(3) The date and time that each CEMS was out-of-control, including the information in § 63.8(c)(8).

(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of start-up, shutdown, or malfunction or during another period.

(5) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.

(6) A breakdown of the total duration of the deviations during the reporting period into those that are due to start-up, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(7) A summary of the total duration of CEMS downtime during the reporting period, and the total duration of CEMS downtime as a percent of the total source operating time during that reporting period.

(8) A breakdown of the total duration of CEMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, nonmonitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.

(9) A brief description of the metal coil coating line.

(10) The monitoring equipment manufacturer(s) and model number(s).

(11) The date of the latest CEMS certification or audit.

(12) A description of any changes in CEMS, processes, or controls since the last reporting period.

[67 FR 39812, June 10, 2002, as amended at 68 FR 12592, Mar. 17, 2003]

#### **§ 63.5190 What records must I maintain?**

(a) You must maintain the records specified in paragraphs (a) and (b) of this section in accordance with § 63.10(b)(1):

(1) Records of the coating lines on which you used each compliance option and the time periods (beginning and ending dates and times) you used each option.

(2) Records specified in § 63.10(b)(2) of all measurements needed to demonstrate compliance with this subpart, including:

(i) Continuous emission monitor data in accordance with § 63.5150(a)(2);

(ii) Control device and capture system operating parameter data in accordance with § 63.5150(a)(1), (3), and (4);

(iii) Organic HAP content data for the purpose of demonstrating compliance in accordance with § 63.5160(b);

(iv) Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with § 63.5160(c);

(v) Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with § 63.5160(d), (e), and (f); and

(vi) Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with § 63.5170(a), (b), and (d);

(3) Records specified in § 63.10(b)(3); and

(4) Additional records specified in § 63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with § 63.5150(a)(2).

(b) Maintain records of all liquid-liquid material balances that are performed in accordance with the requirements of § 63.5170.

**Delegation of Authority**

**§ 63.5200 What authorities may be delegated to the States?**

(a) This subpart can be implemented and enforced by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under section 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and not transferred to the State, local, or tribal agency.

(c) Authority which will not be delegated to States, local, or tribal agencies:

(1) Approval of alternatives to the emission limitations in § 63.5120;

(2) Approval of major alternatives to test methods under § 63.7(e)(2)(ii) and (f) and as defined in § 63.5160;

(3) Approval of major alternatives to monitoring under § 63.8(f) and as defined in § 63.5150; and

(4) Approval of major alternatives to recordkeeping and reporting under § 63.10(f) and as defined in §§ 63.5180 and 63.5190.

**§§ 63.5201-63.5209 [Reserved]**

**Table 1 to Subpart SSSS of Part 63—Operating Limits if Using Add-on Control Devices and Capture System**

If you are required to comply with operating limits by § 63.5121, you must comply with the applicable operating limits in the following table:

<b>For the following device . . .</b>	<b>You must meet the following operating limit . . .</b>	<b>And you must demonstrate continuous compliance with the operating limit by . . .</b>
1. thermal oxidizer	a. the average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to § 63.5160(d)(3)(i)	i. collecting the combustion temperature data according to § 63.5150(a)(3); ii. reducing the data to 3-hour block averages; and iii. maintaining the 3-hour average combustion temperature at or above the temperature limit.
2. catalytic oxidizer	a. the average temperature measured just before the catalyst bed in any 3-hour period must not fall below the limit established according to § 63.5160(d)(3)(ii); and either	i. collecting the temperature data according to § 63.5150(a)(3); ii. reducing the data to 3-hour block averages; and iii. maintaining the 3-hour average temperature before the catalyst bed at or above the temperature limit.
	b. ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according	i. collecting the temperature data according to § 63.5150(a)(3); ii. reducing the data to 3-hour block averages; and iii. maintaining the 3-hour average temperature difference at or above the temperature difference limit.

	to § 63.5160(d)(3)(ii); or	
	c. develop and implement an inspection and maintenance plan according to § 63.5160(d)(3)(ii)	maintaining an up-to-date inspection and maintenance plan, records of annual catalyst activity checks, records of monthly inspections of the oxidizer system, and records of the annual internal inspections of the catalyst bed. If a problem is discovered during a monthly or annual inspection required by § 63.5160(d)(3)(ii), you must take corrective action as soon as practicable consistent with the manufacturer's recommendations.
3. emission capture system	develop a monitoring plan that identifies operating parameter to be monitored and specifies operating limits according to § 63.5150(a)(4)	conducting monitoring according to the plan § 63.5150(a)(4).

**Table 2 to Subpart SSSS of Part 63—Applicability of General Provisions to Subpart SSSS**

You must comply with the applicable General Provisions requirements according to the following table:

<b>General provisions reference</b>	<b>Applicable to subpart SSSS</b>	<b>Explanation</b>
§ 63.1(a)(1)-(4)	Yes	
§ 63.1(a)(5)	No	Reserved.
§ 63.1(a)(6)-(8)	Yes	
§ 63.1(a)(9)	No	Reserved.
§ 63.1(a)(10)-(14)	Yes	
§ 63.1(b)(1)	No	Subpart SSSS specifies applicability.
§ 63.1(b)(2)-(3)	Yes	
§ 63.1(c)(1)	Yes	
§ 63.1(c)(2)	Yes	
§ 63.1(c)(3)	No	Reserved.
§ 63.1(c)(4)	Yes	
§ 63.1(c)(5)	Yes	
§ 63.1(d)	No	Reserved.
§ 63.1(e)	Yes	
§ 63.2	Yes	Additional definitions in subpart SSSS.
§ 63.3(a)-(c)	Yes	
§ 63.4(a)(1)-(3)	Yes	
§ 63.4(a)(4)	No	Reserved.

§ 63.4(a)(5)	Yes	
§ 63.4(b)-(c)	Yes	
§ 63.5(a)(1)-(2)	Yes	
§ 63.5(b)(1)	Yes	
§ 63.5(b)(2)	No	Reserved.
§ 63.5(b)(3)-(6)	Yes	
§ 63.5(c)	No	Reserved.
§ 63.5(d)	Yes	Only total HAP emissions in terms of tons per year are required for § 63.5(d)(1)(ii)(H).
§ 63.5(e)	Yes	
§ 63.5(f)	Yes	
§ 63.6(a)	Yes	
§ 63.6(b)(1)-(5)	Yes	
§ 63.6(b)(6)	No	Reserved.
§ 63.6(b)(7)	Yes	
§ 63.6(c)(1)-(2)	Yes	
§ 63.6(c)(3)-(4)	No	Reserved.
§ 63.6(c)(5)	Yes	
§ 63.6(d)	No	Reserved.
§ 63.6(e)	Yes	Provisions in § 63.6(e)(3) pertaining to startups, shutdowns, malfunctions, and CEMS only apply if an add-on control system is used.
§ 63.6(f)	Yes	
§ 63.6(g)	Yes	
§ 63.6(h)	No	Subpart SSSS does not require continuous opacity monitoring systems (COMS).
§ 63.6(i)(1)-(14)	Yes	
§ 63.6(i)(15)	No	Reserved.
§ 63.6(i)(16)	Yes	
§ 63.6(j)	Yes	
§ 63.7	Yes	With the exception of § 63.7(a)(2)(vii) and (viii), which are reserved.
§ 63.8(a)(1)-(2)	Yes	
§ 63.8(a)(3)	No	Reserved.
§ 63.8(a)(4)	Yes	
§ 63.8(b)	Yes	

§ 63.8(c)(1)-(3)	Yes	Provisions only apply if an add-on control system is used.
§ 63.8(c)(4)	No	
§ 63.8(c)(5)	No	Subpart SSSS does not require COMS.
§ 63.8(c)(6)	Yes	Provisions only apply if CEMS are used.
§ 63.8(c)(7)-(8)	Yes	
§ 63.8(d)-(e)	Yes	Provisions only apply if CEMS are used.
§ 63.8(f)(1)-(5)	Yes	
§ 63.8(f)(6)	No	Section 63.8(f)(6) provisions are not applicable because subpart SSSS does not require CEMS.
§ 63.8(g)(1)-(4)	Yes	
§ 63.8(g)(5)	No	
§ 63.9(a)	Yes	
§ 63.9(b)(1)	Yes	
§ 63.9(b)(2)	Yes	With the exception that § 63.5180(b)(1) provides 2 years after the proposal date for submittal of the initial notification.
§ 63.9(b)(3)-(5)	Yes	
§ 63.9(c)-(e)	Yes	
§ 63.9(f)	No	Subpart SSSS does not require opacity and visible emissions observations.
§ 63.9(g)	No	Provisions for COMS are not applicable.
§ 63.9(h)(1)-(3)	Yes	
§ 63.9(h)(4)	No	Reserved.
§ 63.9(h)(5)-(6)	Yes	
§ 63.9(i)	Yes	
§ 63.9(j)	Yes	
§ 63.10(a)	Yes	
§ 63.10(b)(1)-(3)	Yes	Provisions pertaining to startups, shutdowns, malfunctions, and maintenance of air pollution control equipment and to CEMS do not apply unless an add-on control system is used. Also, paragraphs (b)(2)(vi), (x), (xi), and (xiii) do not apply.
§ 63.10(c)(1)	No	
§ 63.10(c)(2)-(4)	No	Reserved.
§ 63.10(c)(5)-(8)	No	
§ 63.10(c)(9)	No	Reserved.
§ 63.10(c)(10)-(15)	No	

§ 63.10(d)(1)-(2)	Yes	
§ 63.10(d)(3)	No	Subpart SSSS does not require opacity and visible emissions observations.
§ 63.10(d)(4)-(5)	Yes	
§ 63.10(e)	No	
§ 63.10(f)	Yes	
§ 63.11	Yes	
§ 63.12	Yes	
§ 63.13	Yes	
§ 63.14	Yes	Subpart SSSS includes provisions for alternative ASTM and ASME test methods that are incorporated by reference.
§ 63.15	Yes	

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>EDCOAT Limited Partnership</b>
<b>Source Location:</b>	<b>30350 Edison Road, New Carlisle, IN 46552</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)</b>
<b>Permit Renewal No.:</b>	<b>T 141-32316-00102</b>
<b>Permit Reviewer:</b>	<b>Ryan Graunke</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from EDCOAT Limited Partnership relating to the operation of a stationary roll coil coating manufacturing plant. On September 14, 2012, EDCOAT Limited Partnership submitted an application to the OAQ requesting to renew its operating permit. EDCOAT Limited Partnership was issued a Part 70 Operating Permit (T141-10725-00102) on August 7, 2003 and its first Part 70 Operating Permit Renewal (T141-22516-00102) on July 17, 2008.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Upper Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.
- (b) One (1) roll coil finish/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas-fired bake oven, identified as Lower Coating Room, with a maximum capacity of 60,000 pounds per hour, using a thermal oxidizer as control, constructed in June 1996, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.

The Upper and Lower Coating Rooms are considered affected facilities under 40 CFR 60, Subpart TT and 40 CFR 63, Subpart SSSS.

**Note:** Sometimes only one coating is applied, making the prime coating application system (Upper Coating Room) the finish/top coating application system (Lower Coating Room). The Upper and Lower Coating Rooms operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products. Therefore, the two coating systems are considered a single process, identified as the Roll Coil Coating Application System.

In addition, the thermal oxidizer is a common control device for the Upper Coating Room and Lower Coating Room, exhausting to a common stack.

- (c) Two (2) natural-gas fired bake ovens in the coating application system, which collectively include the following process burners:

- (1) Six (6) model 4988R-2500 natural gas-fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
- (2) Four (4) model 4988R-4000 natural gas-fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
- (3) Four (4) model 4988R-6000 natural gas-fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996
- (d) One (1) natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14.

<b>Insignificant Activities</b>
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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 Btu per hour:
  - (1) Four (4) natural gas-fired unit heaters, each rated at 0.3 million Btu per hour, constructed in March 1998;
  - (2) Three (3) natural gas-fired room heaters, each rated at 4.86 million Btu per hour, constructed in March 1998;
  - (3) Four (4) natural gas-fired make-up air units, each rated at 3.78 million Btu per hour, constructed in March 1998;
- (b) Combustion source flame safety purging on startup;
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Refractory storage not requiring air pollution control equipment;
- (e) Degreasing operations (Safety-Kleen) that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-5]
- (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 degrees C, or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C;the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (g) Closed loop heating and cooling systems;
- (h) Infrared cure equipment;
- (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;

- (j) Natural draft cooling towers not regulated under a NESHAP;
- (k) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (l) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (o) Purge double block and bleed valves; and
- (p) A laboratory as defined in 326 IAC 2-7-1(20)(C).

**Existing Approvals**

Since the issuance of Part 70 Operating Permit Renewal (T141-22516-00102) on August 17, 2008, the source has not received any additional approvals.

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

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in St. Joseph County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, 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 South Bend-Elkhart area, including St. Joseph 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 standard was revoked effective June 15, 2005. Unclassifiable or attainment effective 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. St. Joseph 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>

St. Joseph County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

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

**Fugitive Emissions**

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

<b>Unrestricted Potential Emissions</b>	
<b>Pollutant</b>	<b>Tons/year</b>
PM	Less than 100
PM <sub>10</sub>	Less than 100
PM <sub>2.5</sub>	Less than 100
SO <sub>2</sub>	Less than 100
VOC	Greater than 250
CO	Less than 100
NO <sub>x</sub>	Less than 100
GHGs as CO <sub>2</sub> e	Less than 100,000
Single HAP	Greater than 10
Total HAP	Greater than 25

HAPs	Tons/year
Ethylene Glycol	Greater than 10
Formaldehyde	Less than 10
Isophorone	Greater than 10
Melamine Formaldehyde Resin	Greater than 10
Toulene	Greater than 10
Xylene	Greater than 10
<b>Total</b>	<b>Greater than 25</b>

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

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, 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 new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Roll Coil Coating***	-	-	-	-	-	246.7	-	-	>25	>10 (Ethylene Glycol)
Natural Gas Combustion	0.94	3.75	3.75	0.30	49.3	2.71	36.0	59,526	0.93	0.89 (Hexane)
Degreasing	-	-	-	-	-	0.48	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>0.94</b>	<b>3.75</b>	<b>3.75</b>	<b>0.30</b>	<b>49.3</b>	<b>249.9</b>	<b>36.0</b>	<b>59,526</b>	<b>&gt;25</b>	<b>&gt;10 (Ethylene Glycol)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	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".  
 \*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 \*\*\*The source will continue to limit the VOC emissions from the roll coil coating operation in order to render the requirements of 326 IAC 2-2 (PSD) not applicable.

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is major for Section 112 of the Clean Air Act because single HAP emissions are greater than 10 tons per year and total HAPs emissions are greater than 25 tons per year.

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

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

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Upper Coating Room / VOC	Thermal oxidizer	Y	1740	246.7	100	Y	Y
Lower Coating Room / VOC	Thermal oxidizer	Y			100	Y	Y
Upper Coating Room / HAPs (Single and combined)	Thermal oxidizer	Y	>10 >25	>10 >25	10 25	Y	Y
Lower Coating Room / HAPs (Single and combined)	Thermal oxidizer	Y	>10 >25	>10 >25	10 25	Y	Y

Based on this evaluation, the requirements of 40 CFR 64, CAM are potentially applicable to the Upper and Lower Coating Rooms for VOC and HAPs. However, both emission units are subject to 40 CFR 63, Subpart SSSS, which was approved on June 10, 2002. Therefore, the upper and lower coating rooms are exempt from CAM pursuant to 40 CFR 64.2 (b)(i). Compliance with the requirements of 40 CFR 63, Subpart SSSS satisfies the CAM requirements for VOC and HAPs emissions for the Upper and Lower Coating Rooms.

This determination was initially made in the Part 70 Operating Permit Renewal (T141-22516-00102) on July 17, 2008.

New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The upper and lower coating rooms are still subject to the New Source Performance Standard for metal coil surface coating operation (40 CFR 60, Subpart TT), which is incorporated by reference as 326 IAC 12. The roll coil coating application system meets the definition of a metal coil surface coating operation in 40 CFR 60.461 and commenced construction after January 5, 1981.

Nonapplicable portions of the NSPS will not be included in the permit. The emission unit is subject to the following portions of Subpart TT.

- (1) 40 CFR 60.460
- (2) 40 CFR 60.461
- (3) 40 CFR 60.462 (a)(4)
- (4) 40 CFR 60.463 (a), (b), (c)(4)
- (5) 40 CFR 60.464 (b), (c)
- (6) 40 CFR 60.465
- (7) 40 CFR 60.466

Stack testing is required to demonstrate compliance with 40 CFR 60 Subpart TT.

This is an existing applicable requirement and no change has been made in this second renewal.

- (c) The upper and lower coating rooms are still subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Coating (40 CFR 63, Subpart SSSS), which is incorporated by reference as 326 IAC 20-64, because the roll coil coating application system meets the definition of a coil coating line in 40 CFR 63.5110 and is located at a source that is a major source of HAPs.

Non applicable portions of the NESHAP will not be included in the permit. The emission units are subject to the following portions of Subpart SSSS:

- (1) 40 CFR 63.5080
- (2) 40 CFR 63.5090
- (3) 40 CFR 63.5100
- (4) 40 CFR 63.5110
- (5) 40 CFR 63.5120
- (6) 40 CFR 63.5121
- (7) 40 CFR 63.5130
- (8) 40 CFR 63.5140
- (9) 40 CFR 63.5150
- (10) 40 CFR 63.5160
- (11) 40 CFR 63.5170
- (12) 40 CFR 63.5180
- (13) 40 CFR 63.5190
- (14) 40 CFR 63.5200
- (15) Table 1 and 2 of 40 CFR 63 Subpart SSSS

Stack testing is required to demonstrate compliance with 40 CFR 63, Subpart SSSS.

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

This is an existing applicable requirement and no change has been made in this second renewal.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, since the insignificant degreasing operation does not use halogenated HAP solvents as specified in 40 CFR 63.460(a).

<b>State Rule Applicability - Entire Source</b>
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- (a) 326 IAC 2-2 (PSD - Prevention of Significant Deterioration)  
This source is considered a minor source under the PSD rules because the Permittee has accepted conditions limiting the potential to emit VOC to less than 250 tons per year and it is not one of the 28 listed source categories.

The source has been using the thermal oxidizer to limit the VOC emissions. However, there are times that the thermal oxidizer is not used to control VOC emissions. Therefore, the source has been required to limit the VOC emissions as follows:

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

- (1) The VOC emissions from the Roll Coil Coating Application System shall be limited to less than 246.7 tons per twelve (12) consecutive month period.

Monthly VOC emissions shall be calculated using the following equations:

- (a) When Thermal Oxidizer is operating:

$$\text{VOC Emissions} = [(\text{VOC usage}) \times (1 - \text{CE}/100)]$$

Where: VOC usage = Upper and Lower Coating Application System  
VOC usage  
CE = 90.9% (November 2010 stack test) or the overall control efficiency of the thermal oxidizer from the most recent valid compliance demonstration

- (b) When Thermal Oxidizer is not operating:

$$\text{VOC emissions} = \text{VOC usage}$$

- (c) Total VOC Emissions =  $[(\text{VOC usage}) \times (1 - \text{CE}/100)] + (\text{Uncontrolled VOC usage})$

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Note: The existing VOC emission limit was revised from 247 to 246.7 tons/year because the PTE of VOC from the insignificant degreasing activities were included in the source-wide PTE of VOC. Therefore a new VOC emission limit will be included in this Renewal. This is a Title 1 change.

- (b) 326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1, the source is a major source of HAPs due to its potential to emit 10 tons per year of any HAP and 25 tons per year of any combination of HAP. However, since the source received all necessary permits for construction prior to July 27, 1997, 326 IAC 2-4.1-1 does not apply.

- (c) 326 IAC 2-6 (Emission Reporting)  
This source, not located in Lake, Porter, or LaPorte County, 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)(2), 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, 2013, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) 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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)  
The source is not subject to 326 IAC 6-5 because it has potential fugitive particulate matter emissions less than twenty-five (25) tons per year
- (g) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(c)(2), the source is exempt from 326 IAC 6.5 since the source performs surface coating using roll coating application methods and has potential and actual particulate matter emissions less than one hundred (100) and ten (10) tons per year, respectively.
- (h) 326 IAC 8-6 (Organic Solvent Emission Limitations)  
The source is not subject to 326 IAC 8-6 because it did not commence operation between Oct. 7, 1974 and December 31, 1979.

<b>State Rule Applicability – Individual Facilities</b>
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Roll Coil Coating Application System

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(6), the roll coil coating application system is exempt from 326 IAC 6-3-2 since the system uses roll coating surface coating application methods and does not emit particulate emissions.
- (b) 326 IAC 8-1-6 (New Facilities General Reduction Requirements)

The roll coil coating application system is not subject to 326 IAC 8-1-6 since it is subject to 326 IAC 8-2-4.

(c) 326 IAC 8-2-4 (Coil Coating Operations)

The roll coil coating application system is subject to the requirements of 326 IAC 8-2-4 because it was constructed after July 1, 1990 and has actual emissions greater than 15 pounds per day of VOC before add-on controls. Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), the owner or operator of the coil coating operation may not cause, allow or permit the discharge into the atmosphere any VOC in excess of 2.6 pounds per gallon, excluding water, delivered to the applicator.

Since some of the coatings used have VOC content greater than 2.6 pounds per gallon, excluding water, the source has chosen to comply using one or more of the following options:

- (1) Pursuant to 326 IAC 8-1-2(a)(7), compliance with the VOC emission limit of 2.6 pounds per gallon, excluding water, as applied, shall be determined by the volume weighted average of coatings on a daily basis using the following equation:

$$A = [\Sigma(C * U) / \Sigma U]$$

Where: A = daily volume weighted average in pounds VOC per gallon, excluding water, as applied  
C = VOC content of coating in pounds VOC per gallon, excluding water, as applied  
U = usage rate of coating in gallons per day

- (2) Pursuant to 326 IAC 8-1-2 (b), the roll coil coating application line VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (1).

$$E = L / (1 - L / D) = 4.02 \text{ pounds VOC per gallon of coating solids}$$

Where: E = equivalent emission limit in pounds per gallon of coating solids, as applied  
L = emission limit of 2.6 pounds of VOC per gallon of coating less water, as applied (326 IAC 8-2-4).  
D = baseline solvent density of VOC in coating (7.36 pounds of VOC per gallon of solvent).

- (3) The daily weighted average of all coatings shall be limited to less than 4.02 pounds of VOC per gallon of coating solids, as applied.

- (4) Pursuant to 8-1-2(c), the minimum overall efficiency of the thermal oxidizer shall be calculated using the following equation:

$$O = [(V - E) / V] * 100$$

Where: O = Equivalent overall efficiency of the thermal oxidizer as a percentage  
V = The daily weighted average of all coatings in pounds of VOC per gallon of coating solids  
E = Equivalent emissions limit in pounds of VOC per gallon of coating solids (4.02 pounds of VOC per gallon of coating solids as shown in Appendix A)

Using the worst-case noncompliant coating, Primer 368-25Y27-0261, with 44.11 pounds of VOC per gallon of coating solids, as-applied, a minimum overall efficiency of 90.9% for

the thermal oxidizer is required. Because the thermal oxidizer operates at 90.9% (November 2, 2010 stack test), the source is able to comply with 326 IAC 8-2-4.

- (5) For days when the thermal oxidizer is used intermittently during the day, or not used at all during the day, the achievement of the limit shall be based on the following equation:

$$A = [\Sigma(C * U) / \Sigma U]_{NT} + \{(100\% - R) * [\Sigma(C * U) / \Sigma U]_T\}$$

- Where:
- A = Daily volume weighted average in pounds VOC per gallon of coating less water
  - C = VOC content of coating in pounds VOC per gallon of coating less water
  - U = Usage rate of coating in gallons per day
  - R = 90.9 % or the most recent control efficiency at which compliance is demonstrated
- NT: Refers to applications during which the oxidizer is not operated at or above a three-hour average temperature of 1310°, or the latest tested temperature
- T: Refers to applications during which the oxidizer is operated at or above a three-hour average temperature of 1310°F, or the latest tested temperature.

This is an existing applicable requirement and no change has been in this second renewal.

#### Insignificant Degreasing Operations

- (a) 326 IAC 8-3-2 (Cold Cleaner Operation)  
The insignificant cold cleaner degreasing operation is subject to the requirements of 326 IAC 8-3-2 because it was constructed after January 1, 1980. Therefore, pursuant to 326 IAC 8-3-2, the owner or operator of the cold cleaning facility shall:
- (1) Equip the cleaner with a cover;
  - (2) Equip the cleaner with a facility for draining cleaned parts;
  - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label summarizing the operating requirements;
  - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)  
The insignificant cold cleaner degreaser is not subject to 326 IAC 8-3-5 because it is equipped with a remote solvent reservoir.

<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.

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

Emission Units	Control Device	Pollutant	Frequency of Testing
Upper and Lower Coating Rooms	Thermal oxidizer	VOC	Once (1) every 5 years from the date of the most recent compliance demonstration

The Upper and Lower coating application systems are controlled by one thermal oxidizer. The minimum overall efficiency of the thermal oxidizer is 90.9%, which for the worst-case coating to comply with 326 IAC 8-2-4, see Calculations in Appendix A of this TSD. The last valid compliance demonstration was conducted on November 2, 2010.

This is a Title I change.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Thermal Oxidizer	Temperature	Continuous and 3-hr average	As determined at test	Response Steps
	Duct Pressure	Daily	Normal-Abnormal	

These monitoring conditions are necessary because the thermal oxidizer for the roll coil coating application system must operate properly to comply with 326 IAC 8-2-4, 40 CFR 60, Subpart TT, and 40 CFR 63, Subpart SSSS, and render 326 IAC 2-2 (PSD) not applicable.

**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 submitted by the applicant.

An application for the purposes of this review was received on September 14, 2012.

**Conclusion**

The operation of this stationary roll coil coating manufacturing plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 141-32316-00102.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Ryan Graunke 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (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)

**Appendix A: Emissions Calculations  
Emission Summary**

**Source Name:** EDCOAT Ltd. Partnership

**Address:** 30350 Edison Road, New Carlisle, IN 46552

**Permit Number:** T 141-32316-00102

**Permit Reviewer:** Ryan Graunke

Uncontrolled Potential to Emit (tons/year)											
Facility	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP	
Roll Coil Coating	-	-	-	-	-	1,740.2	-	-	885.7	462.8	Ethylene Glycol
Natural Gas Combustion	0.94	3.75	3.75	0.30	49.3	2.71	41.4	59,526	0.93	0.89	Hexane
Degreasing	-	-	-	-	-	0.48	-	-	1.05E-04	1.05E-04	Xylene
<b>Total Emissions</b>	<b>0.94</b>	<b>3.75</b>	<b>3.75</b>	<b>0.30</b>	<b>49.3</b>	<b>1,743.4</b>	<b>41.4</b>	<b>59,526</b>	<b>886.7</b>	<b>462.8</b>	<b>Ethylene Glycol</b>

Controlled Potential to Emit (tons/year)											
Facility	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP	
Roll Coil Coating	-	-	-	-	-	246.7	-	-	>25	>10	Ethylene Glycol
Natural Gas Combustion	0.94	3.75	3.75	0.30	49.3	2.71	41.4	59,526	0.93	0.89	Hexane
Degreasing	-	-	-	-	-	0.48	-	-	1.05E-04	1.05E-04	Xylene
<b>Total Emissions</b>	<b>0.94</b>	<b>3.75</b>	<b>3.75</b>	<b>0.30</b>	<b>49.3</b>	<b>249.9</b>	<b>41.4</b>	<b>59,526</b>	<b>&gt;25</b>	<b>&gt;10</b>	<b>Ethylene Glycol</b>

**Appendix A: Emissions Calculations  
Roll Coil Coating PTE of VOC**

**Source Name:** EDCOAT Ltd. Partnership  
**Source Location:** 30350 Edison Road, New Carlisle, IN 46552  
**Permit Number:** T 141-32316-00102  
**Permit Reviewer:** Ryan Graunke

Product	Coating Type	Coating ID	Density (lb/gal)	Weight % Volatile (Water & VOC)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	VOC content (lb VOC/gal coating)	VOC content (lb VOC/gal coating less water)	VOC content (lb VOC/gal coating solids)	Dry film thickness (mil)	Strip width (in)	Sides to coat	Line speed (ft/min)	Maximum usage rate (gal/hr)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)					
1	Primer	LKY0017	9.74	53.9%	40.7%	13.2%	47.7%	37.0%	1.29	2.46	3.47	0.2	27.75	2	500	46.75	263.3	24.0					
	Finish	PH2R22435	10.76	34.0%	0.0%	34.0%	0.0%	52.0%	3.65	3.65	7.03	0.8	27.75	1	500	66.53	1064.9	96.9					
																<b>Totals:</b>	<b>113.29</b>	<b>1328.1</b>	<b>120.9</b>				
2	Finish	PW2R24817	12.01	28.6%	0.0%	28.6%	0.0%	54.7%	3.44	3.44	6.29	0.8	24	1	500	54.69	824.0	75.0					
	Finish	PS2R20846	10.49	34.8%	0.0%	34.8%	0.0%	52.2%	3.65	3.65	6.99	0.8	24	1	500	57.37	916.2	83.4					
																<b>Totals:</b>	<b>112.06</b>	<b>1740.2</b>	<b>158.4</b>				
3	Primer	368-25Y27-0261	8.36	77.0%	0.0%	77.0%	0.0%	14.6%	6.44	6.44	44.11	0.12	27	1	300	20.75	585.3	53.3					
	Blue Backer	611-FA27-0002	8.79	64.0%	39.0%	25.0%	41.1%	33.2%	2.20	3.74	6.63	0.13	27	1	300	9.88	95.2	8.7					
	Finish	373-30W27-0433	11.98	7.1%	0.0%	7.1%	0.0%	88.5%	0.85	0.85	0.96	3.61	27	1	300	102.95	385.2	35.0					
																<b>Totals:</b>	<b>133.58</b>	<b>1065.7</b>	<b>97.0</b>				
4	Primer	368-25Y27-0261	8.36	77.0%	0.0%	77.0%	0.0%	14.6%	6.44	6.44	44.11	0.12	18.32	1	300	14.08	397.1	36.1					
	Blue Backer	611-FA27-0002	8.79	64.0%	39.0%	25.0%	41.1%	33.2%	2.20	3.74	6.63	0.13	18.32	1	300	6.70	64.6	5.9					
	Finish	373-30W27-0433	11.98	7.1%	0.0%	7.1%	0.0%	88.5%	0.85	0.85	0.96	3.61	18.32	1	300	69.85	261.3	23.8					
																<b>Totals:</b>	<b>90.64</b>	<b>723.1</b>	<b>65.8</b>				
5	Blue Backer	611-FA27-0002	8.79	64.0%	39.0%	25.0%	41.1%	33.2%	2.20	3.74	6.63	0.12	18.32	1	700	14.44	139.2	12.7					
	Finish	PH2R22435	10.76	34.0%	0.0%	34.0%	0.0%	52.0%	3.65	3.65	7.03	0.8	18.32	1	700	61.49	984.2	89.6					
																<b>Totals:</b>	<b>75.93</b>	<b>1123.4</b>	<b>102.2</b>				
																<b>Worst-case</b>		<b>1740.2</b>	<b>246.7</b>				

**NOTES:**

There are no PM emissions from the roll coil coating system due to 100% transfer efficiency

Product 2 represents the worst-case scenario used to calculate the uncontrolled PTE of VOC

Reported efficiency of thermal oxidizer (90.9%) is from November 2, 2010 stack tes

Worst-Case controlled PTE is the maximum allowable emissions to avoid 326 IAC 2-2 (PSD) using a combination of thermal oxidizer control and 326 IAC 8-2-4 compliant coating

**METHODOLOGY:**

Weight % VOC = Weight % Volatile - Weight % Water

VOC content (lb VOC/gal coating) = Weight % VOC \* Density (lb/gal)

VOC content (lb VOC/gal coating less water) = Weight % VOC \* Density (lb/gal) / (1-Volume % Water)

VOC content (lb VOC/gal coating solids) = Weight % VOC \* Density (lb/gal) / (Volume % solids)

Maximum usage rate (gal/hour) = Dry film thickness (mil) / Volume % Solids \* 1 in/1000 mil \* 1 ft/12 in \* Strip Width (in) \* 1 ft/12 in \* Sides to Coat \* Line speed (ft/min) \* 7.4805 ga<sup>3</sup> \* 60 min/hr

Uncontrolled PTE (ton/yr) = Maximum usage rate (gal/hr) \* 8760 hrs/yr \* lb VOC/gal coating \* 1 ton/2000 lb

Controlled PTE (ton/yr) = Uncontrolled PTE (ton/yr) \* (1 - reported efficiency of thermal oxidizer (90.9%))

**Appendix A: Emissions Calculations**  
**Roll Coil Coating Compliance with 326 IAC 8-2-4 and NSPS Subpart TT**

**Source Name:** EDCOAT Ltd. Partnership  
**Source Location:** 30350 Edison Road, New Carlisle, IN 46552  
**Permit Number:** T 141-32316-00102  
**Permit Reviewer:** Ryan Graunke

Product	Coating Type	Coating ID	VOC content (lb VOC/gal coating less water)	326 IAC 8-2-4 Limit (lb VOC/gal coating less water)	Compliant Coating	VOC content (lb VOC/gal coating solids)	Overall efficiency of thermal
1	Primer	LKY0017	2.46	2.60	Yes	3.47	
	Finish	PH2R22435	3.65	2.60	No	7.03	42.8%
2	Finish	PW2R24817	3.44	2.60	No	6.29	36.1%
	Finish	PS2R20846	3.65	2.60	No	6.99	42.5%
3	Primer	368-25Y27-0261	6.44	2.60	No	44.11	90.9%
	Blue Backer	611-FA27-0002	3.74	2.60	No	6.63	39.3%
	Finish	373-30W27-0433A	0.85	2.60	Yes	0.96	
4	Primer	368-25Y27-0261	6.44	2.60	No	44.11	90.9%
	Blue Backer	611-FA27-0002	3.74	2.60	No	6.63	39.3%
	Finish	373-30W27-0433A	0.85	2.60	Yes	0.85	
5	Blue Backer	611-FA27-0002	3.74	2.60	No	6.63	39.3%
	Finish	PH2R22435	3.65	2.60	No	7.03	42.8%

**NOTES:**

Emission limits pursuant to 326 IAC 8-2-4 are as follows:

Compliance	2.6	lb VOC/gal coating less water
Equivalent	4.02	lb VOC/gal coating less water

**METHODOLOGY:**

Pursuant to 8-1-2(b)(1), the equivalent VOC emissions limit is 4.02 lb VOC/gal of coating solids, as applied, calculated using the equation:  $E = L / (1 - L/D)$

Where: E = Equivalent emission limit in lb VOC/gal of coating solids, as applied

L = Emission limit from 8-2-4 (2.6 lb VOC/gal of coating less water)

D = Baseline solvent density of VOC in coating (7.36 lb VOC/gal of solvent)

Pursuant to 8-1-2(c), the overall efficiency of the thermal oxidizer is calculated using the equation:  $O = (V - E) / V * 100$

Where: O = Equivalent overall efficiency of the thermal oxidizer as a percentage

V = The weighted average VOC contents of all coatings in lb VOC/gal of coating solids, as applied

E = Equivalent emission limit = (4.02 lb VOC/gal of coating solids, as applied)

**Appendix A: Emissions Calculations  
Roll Coil Coating PTE of HAPs**

**Source Name:** EDCOAT Ltd. Partnership  
**Source Location:** 30350 Edison Road, New Carlisle, IN 46552  
**Permit Number:** T 141-32316-00102  
**Permit Reviewer:** Ryan Granke

Product	Coating Type	Coating ID	Density (lb/gal)	Maximum usage rate (gal/hr)	Maximum usage rate (lb/hr)	Weight % Formaldehyde	Weight % Ethylene Glycol	Weight % M/F resin	Weight % Isophorone	Weight % Xylene	Weight % Toulene	Weight % Total Organic	Total HAPs (ton/year)
1	PRIMER	LKY0017	9.74	46.75	455.38	0.1%	8.9%	0.0%	0.0%	0.0%	0.0%	9.0%	
	FINISH	PH2R22435	10.76	66.53	715.90	0.0%	9.2%	7.3%	1.4%	0.0%	0.0%	17.9%	
				<b>Total PTE (ton/year):</b>		<b>2.0</b>	<b>462.8</b>	<b>227.3</b>	<b>43.6</b>	<b>0.0</b>	<b>0.0</b>	<b>N/A</b>	<b>735.7</b>
2	FINISH	PW2R24817	12.01	54.69	656.85	0.0%	7.8%	6.1%	0.7%	0.0%	0.0%	14.6%	
	FINISH	PS2R20846	10.49	57.37	601.77	0.0%	7.4%	7.5%	1.4%	1.6%	0.0%	17.9%	
				<b>Total PTE (ton/year):</b>		<b>0.0</b>	<b>416.6</b>	<b>370.6</b>	<b>56.6</b>	<b>41.9</b>	<b>0.0</b>	<b>N/A</b>	<b>885.7</b>
3	PRIMER	368-25Y27-0261	8.36	20.75	173.48	0.0%	8.8%	0.0%	0.0%	0.0%	22.4%	31.2%	
	BLUE BACKER	611-FA27-0002	8.79	9.88	86.84	0.0%	0.0%	5.0%	0.0%	0.0%	0.0%	5.0%	
	FINISH	373-30W27-0433A	11.98	102.95	1233.33	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
				<b>Total PTE (ton/year):</b>		<b>0.0</b>	<b>66.4</b>	<b>18.9</b>	<b>0.0</b>	<b>0.0</b>	<b>169.0</b>	<b>N/A</b>	<b>254.3</b>
4	PRIMER	368-25Y27-0261	8.36	14.08	117.71	0.0%	8.8%	0.0%	0.0%	0.0%	22.4%	31.2%	
	BLUE BACKER	611-FA27-0002	8.79	6.70	58.92	0.0%	0.0%	5.0%	0.0%	0.0%	0.0%	5.0%	
	FINISH	373-30W27-0433A	11.98	69.85	836.83	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
				<b>Total PTE (ton/year):</b>		<b>0.0</b>	<b>45.1</b>	<b>12.8</b>	<b>0.0</b>	<b>0.0</b>	<b>114.7</b>	<b>N/A</b>	<b>172.6</b>
5	BLUE BACKER	611-FA27-0002	8.79	14.44	126.92	0.0%	0.0%	5.0%	0.0%	0.0%	0.0%	5.0%	
	FINISH	PH2R22435	10.76	61.49	661.67	0.0%	9.2%	7.3%	1.4%	0.0%	0.0%	17.9%	
				<b>Total PTE (ton/year):</b>		<b>0.0</b>	<b>264.8</b>	<b>237.7</b>	<b>40.3</b>	<b>0.0</b>	<b>0.0</b>	<b>N/A</b>	<b>542.8</b>

**NOTES:**

HAPs contents are based on MSDS in initial Title V application

M/F Resin is melamine formaldehyde resin, which contains less than 0.3% free formaldehyde

Product 1 represents the worst-case ink used to calculate the uncontrolled PTE of a single HAP (Ethylene Glycol)

Product 2 represents the worst-case ink used to calculate the uncontrolled PTE of total HAPs

**METHODOLOGY:**

Maximum usage rate (lb/hr) = Maximum usage rate (lb/hr) \* density (lb/hr)

Weight % Organic HAPs =  $\sum$ Weight % (organic) HAPs

Total PTE (tons/year) =  $\sum$ (Weight % HAP \* Maximum usage rate (lb/hr)) \* 8760 days/yr \* 1 ton/2000 lbs

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

**Source Name:** EDCOAT Ltd. Partnership  
**Source Location:** 30350 Edison Road, New Carlisle, IN 46552  
**Permit Number:** T 141-32316-00102  
**Permit Reviewer:** Ryan Graunke

Emission unit	Number of Unit	Heat Input Capacity Each (MMBtu/hr/unit)	Total Potential Throughput (MMSCF/yr)
Process burners - model 4988R-2500	6	2.50	128.82
Process burners - model 4988R-4000	4	4.00	137.41
Process burners - model 4988R-2500	4	6.00	206.12
Thermal oxidizer	1	30.00	257.65
Unit heaters	4	0.03	1.03
Room heaters	3	4.86	125.22
Make-up air units	4	3.78	129.85
<b>Total</b>		<b>114.82</b>	<b>986.1</b>

	Pollutant						
	PM*	PM <sub>10</sub> *	direct PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.9	3.7	3.7	0.3	49.3	2.7	41.4

\*PM emission factor is filterable PM only. PM<sub>10</sub> emission factor is filterable and condensable PM<sub>10</sub> combined. PM<sub>2.5</sub> emission factor is filterable and condensable PM<sub>2.5</sub> combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.035E-03	5.917E-04	3.698E-02	8.875E-01	1.676E-03

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.465E-04	5.424E-04	6.903E-04	1.874E-04	1.035E-03
<b>Total HAPs:</b>					<b>9.305E-01</b>

	Greenhouse Gas		
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	59,166	1.1	1.1
Summed Potential Emissions in tons/yr	59,168		
CO <sub>2</sub> e Total in tons/yr	59,526		

**METHODOLOGY:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Total Heat Input Capacity =  $\sum$ (Heat Input Capacity Each (MMBtu/hr) \* Number of Units)

Potential Throughput (MMCF) = Heat Input Capacity Each (MMBtu/hr) \* Number of Units \* 8,760 hrs/yr \* High Heat Value (1 MMCF/1,020 MMBtu)

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

Emission (tons/yr) = Throughput (MMCF/yr) \* Emission Factor (lb/MMCF) \* 1 ton/2000 lbs

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

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

CO<sub>2</sub>e (tons/yr) = CO<sub>2</sub> Potential Emission ton/yr x CO<sub>2</sub> GWP (1) + CH<sub>4</sub> Potential Emission ton/yr x CH<sub>4</sub> GWP (21) + N<sub>2</sub>O Potential Emission ton/yr x N<sub>2</sub>O GWP (310).

**Appendix A: Emissions Calculations  
Insignificant Degreasing Operation**

**Source Name:** EDCOAT Ltd. Partnership  
**Source Location:** 30350 Edison Road, New Carlisle, IN 46552  
**Permit Number:** T 141-32316-00102  
**Permit Reviewer:** Ryan Graunke

Product	Density (lb/gal)	Weight % VOC	VOC content (lb VOC/gal)	Maximum usage rate (gal/yr)	Uncontrolled PTE of VOC (ton/yr)	Weight % Xylene	Uncontrolled PTE of Xylene
Super Agitene 141	6.68	100.0%	6.68	145	0.5	0.97%	1.05E-04

**NOTE:**

VOC content provided in MSDS from the source

Super Agitene 141 is 97% aliphatic petroleum distillate, which is 1% xylene

**METHODOLOGY:**

Weight % VOC = VOC content (lb VOC/gal coating) / Density (lb/gal)

Uncontrolled PTE of VOC (ton/yr) = Maximum usage rate (gal/yr) \* lb VOC/gal coating \* 1 ton/2000 lbs

Weight % Xylene = 97% aliphatic petroleum distillate \* 1% xylene

Uncontrolled PTE of xylene (ton/yr) = Maximum usage rate (gal/yr) \* lb VOC/gal coating / Density (lb/gal) \* 1 ton/2000 lbs



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Jeffrey A Williams  
EDCOAT Limited Partnership  
30350 Edison Road  
New Carlisle, IN 46552-0960

**DATE:** March 7, 2013

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

**SUBJECT:** Final Decision  
Title V - Renewal  
141 - 32316 - 00102

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:  
Sarah Raymond Cornerstone Environmental, Health & Safety  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**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)

March 7, 2013

TO: New Carlisle Olive Township Library

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

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

**Applicant Name: EDCOAT Limited Partnership**  
**Permit Number: 141 - 32316 - 00102**

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**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: March 7, 2013

RE: EDCOAT Limited Partnership / 141 - 32316 - 00102

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

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:  
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

**Please Note:** *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV).*

Enclosures  
CD Memo.dot 11/14/08

# Mail Code 61-53

IDEM Staff	LPOGOST 3/7/2013 Edcoat Ltd. Partnership 141 - 32316 - 00102 final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Jeffrey A Williams Edcoat Ltd. Partnership 30350 Edison Road New Carlisle IN 46552-0960 (Source CAATS) Via confirmed delivery										
2		Merrill & John Clark Michigan Dept. of Environmental Quality 27427 M 60 W Cassopolis MI 49031-9681 (Affected State)										
3		Mr. Al Puplis Wetlands Conservation Association c/o Merrill Clark, 27427 M 60 W Cassopolis MI 49031-9681 (Affected Party)										
4		Elaine Curtis & Elaine Littacs League of Women Voters c/o Merrill Clark, 27427 M 60 W Cassopolis MI 49031-9681 (Affected Party)										
5		Mr. Gary A. Karch Citizens for Environmental Protection c/o Merrill Clark, 27427 N 60 W Cassopolis MI 49031-9681 (Affected Party)										
6		Ms. Merrill Clark Galien River Watershed Council c/o Merrill Clark, 27427 M 60 W Cassopolis MI 49031-9681 (Affected Party)										
7		Mr. Maynard Raefran Organic Growers of Michigan c/o Merrill Clark, 27427 M 60 W Cassopolis MI 49031-9681 (Affected Party)										
8		Mr. Edward J. Walsh, Sr. 52721 Ruth Street Granger IN 46530 (Affected Party)										
9		Mr. John S. Chebot 13367 East 7th Mishawaka IN 46544 (Affected Party)										
10		Mr. Donald E. Dzonar 2428 Greenlawn Ave. Mishawaka IN 46545-3446 (Affected Party)										
11		Mr. Charles Wood 13330 East 7th Mishawaka IN 46545 (Affected Party)										
12		Mr. Patrick J. Higgins P.O. Box 290 New Carlisle IN 46552 (Affected Party)										
13		Mr. Lloyd Keldsen 505 West Elm Street New Carlisle IN 46552 (Affected Party)										
14		Jim, Mary & Nora Kulisiclli 30585 Johnson Road North Liberty IN 46554 (Affected Party)										
15		Mr. Curt Chesney 10299 Cherrywood Lane Osceola IN 46561 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Daniel W. 621 Memorial Drive #402 South Bend IN 46601 (Affected Party)										
2		Mr. James P. Baugh 56215 Ritschard Avenue South Bend IN 46613 (Affected Party)										
3		Mr. John J. Dillon 3113 Riverside Drive South Bend IN 46613 (Affected Party)										
4		Mr. Roger Voelker 603 E Washington Street suite 502 Indianapolis IN 46204-2590 (Affected Party)										
5		Mr. Stan Miles 1230 Catherwood Drive South Bend IN 46614 (Affected Party)										
6		Ms. Kellire Barry 1076 Woodward Avenue South Bend IN 46615 (Affected Party)										
7		Ms. Christine Fiodale 1705 Wall St. South Bend IN 46615 (Affected Party)										
8		Ms. Kathy Keasey 1217 East Bronson South Bend IN 46615 (Affected Party)										
9		Linda Painter Patricia Myers 1217 Portage Avenue South Bend IN 46616 (Affected Party)										
10		Nancy, Earl & Mona Colglazier 28738 Harrison Road South Bend IN 46619 (Affected Party)										
11		Mr. Randy K. Noland 56688 Windsor Avenue South Bend IN 46619 (Affected Party)										
12		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
13		Cynthia Knapp 25523 US 20 South Bend IN 46628 (Affected Party)										
14		Mr. Roger Voelker Citizen Action Colition of Indiana 2015 Western Avenue, Suite 101 South Bend IN 46629 (Affected Party)										
15		Barbara & Keith Crighton 53171 Martin Lane South Bend IN 46635-1386 (Affected Party)										

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											Remarks
1		Corey D. 19024 Glendale Avenue South Bend IN 46637-2703 (Affected Party)									
2		Mr. Rex Eckart 8392 East 525 South Walkerton IN 46574 (Affected Party)									
3		New Carlisle Town Council 113 South Arch Street, P.O. Box 6 New Carlisle IN 46552 (Local Official)									
4		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)									
5		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 (Health Department)									
6		New Carlisle Olive Township Library 408 S. Bray Street New Carlisle IN 46552 (Library)									
7		Sarah Raymond Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Court Zionsville IN 46077 (Consultant)									
8											
9											
10											
11											
12											
13											
14											
15											

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