INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: October 4, 2013

RE: Innovative Coating Solutions / 097 - 33462 - 00717

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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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.

Enclosures
FNPER.dot 6/13/13

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Michael R. Pence
Governor

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New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

Innovative Coating Solutions, Inc.
7950 Georgetown Road, Suite 200
Indianapolis, Indiana 46268

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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 2-8 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.
This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

Operation Permit No.: F097-33462-00717	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 4, 2013 Expiration Date: October 4, 2018

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary automotive interior components manufacturing facility.

Source Address:	7950 Georgetown Rd., Suite 200, Indianapolis, IN 46268
General Source Phone Number:	317-494-3499
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) One (1) adhesive coater and laminator, identified as CO-1, approved for construction in 2013, with a maximum capacity of 40.5 gallons of adhesive per hour, utilizing roll coating application, using one (1) natural gas-fired thermal oxidizer (OX-1) with a maximum heat input capacity of 2.75 MMBtu per hour to control volatile organic compound emissions, and exhausting to stack OX1. When using water based solvents, the adhesive coater and laminator may vent directly to a bypass stack OX2 without the use of the thermal oxidizer

(b) One (1) natural gas-fired oven, identified as OV-1, approved for construction in 2013, with a maximum heat input capacity of 1.50 MMBtu per hour, and exhausting to stack OV1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Four (4) natural gas fired space heaters, identified as SP1 through SP4, approved for construction in 2013, each with a maximum heat capacity of 0.8 MMBtu per hour, using no controls, and exhausting outdoors.

(b) One (1) natural gas fired make-up unit, identified as Hastings MUA, approved for construction in 2013, with a maximum heat input capacity of 1.27 MMBtu per hour, using no controls, and exhausting outdoors.

(c) Two (2) natural gas fired furnaces, identified as Furnace 1 and Furnace 2, approved for construction in 2013, each with a maximum heat input capacity of 0.125 MMBtu per hour, and exhausting outdoors.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F097-33462-00717, 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, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.7 Severability [326 IAC 2-8-4(4)]

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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

(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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) If required by specific condition(s) in Section D of this permit, 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs

and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.14 Emergency Provisions [326 IAC 2-8-12]

(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 except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-3(c)(6) 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 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) 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.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F097-33462-00717 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

(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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
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 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 FESOP 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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.4 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.5 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.6 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).

C.7 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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 2-8-4][326 IAC 2-8-5]

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(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.16 General Reporting Requirements [326 IAC 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) adhesive coater and laminator, identified as CO-1, approved for construction in 2013, with a maximum capacity of 40.5 gallons of adhesive per hour, utilizing roll coating application, using one (1) natural gas-fired thermal oxidizer (OX-1) with a maximum heat input capacity of 2.75 MMBtu per hour to control volatile organic compound emissions, and exhausting to stack OX1. When using water based solvents, the adhesive coater and laminator may vent directly to a bypass stack OX2 without the use of the thermal oxidizer.

(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 2-8-4(1)]

D.1.1 FESOP Limitation [326 IAC 2-8-4]

In order to comply with 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(1) The VOC emissions (after control) from the adhesive coater and laminator CO-1, shall not exceed 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide VOC emissions to less than 100 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

D.1.2 Volatile Organic Compounds (VOC) Limitation [40 CFR Part 60, Subpart RR]

In order to render the requirements of 40 CFR 60.442 (Standard for volatile organic compounds under the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations) not applicable, the total input of VOC, including solvents, coatings, and adhesives, delivered to the adhesive coater and laminator CO-1 shall be less than fifty (50) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC input to the adhesive coater and laminator CO-1 to less than 50 tons per 12 consecutive month period, and shall render the requirements of 40 CFR 60.442 (Standard for volatile organic compounds under the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permitee shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of thirty-five hundredths (0.35) kilogram per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from the adhesive coater and laminator CO-1.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for adhesive coater and laminator CO-1 and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

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

(a) When using the thermal oxidizer OX-1 to comply with the Conditions D.1.1 and/or D.1.3, the thermal oxidizer (OX-1) shall be in operation at all times that the adhesive coater and laminator (CO-1) is in operation.

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

D.1.6 Volatile Organic Compounds (VOC)

In order to determine compliance with Condition D.1.1, the Permittee shall calculate the VOC emissions using the following equation:

Total VOC emitted = [VOC input to CO-1 x (1 - control efficiency of thermal oxidizer OX-1 from the most recent valid compliance demonstration)]

When the thermal oxidizer OX-1 is not operating, the control efficiency = 0.

D.1.7 Volatile Organic Compounds (VOCs) [326 IAC 8-1-2]

When using the thermal oxidizer OX-1 to comply with the VOC content limitation in Condition D.1.3, the Permittee shall operate the thermal oxidizer OX-1 at all times that the adhesive coater and laminator CO-1 is operating and the minimum required overall efficiency of the thermal oxidizer shall be calculated as follows as described in 326 IAC 8-1-2(b):

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

Where:

E = Equivalent emission limit in pounds per gallon of solids, as applied

L= Applicable emission limit in pounds of VOC per gallon of coating 2.9 pounds of VOC per gallon less water

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

A solvent density of seven and thrity-six hundreth (7.36) pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

E= 2.9 / [1 - (2.9/7.36)] = 4.79 pounds per gallon of solids

The minimum overal control efficiency of the oxidizer has been calculated as follows as described in 326 IAC 8-1-2(c).

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

Where:

V= the actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content, as applied to the 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 gallons of coating solids as applied;

E= 4.79 pounds per gallon of solids; and

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

D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1),(4)][326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 (if the thermal oxidizer OX-1 is used to comply with the VOC limitation under Condition D.1.1), D.1.3, and D.1.7, the Permittee shall conduct a performance test to verify the overall VOC control efficiency of the thermal oxidizer OX-1 not later than one hundred and eighty (180) days after initial startup of the adhesive coater and laminator CO-1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 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.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated and maintained on the thermal oxidizer OX-1 for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,400°F.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 (if the thermal oxidizer OX-1 is used to comply with the VOC limitation under Condition D.1.1), D.1.3, and D.1.7.

(c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test. When, for any one reading, the 3-hour average temperature falls below the temperature listed above or the average temperature established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour temperature that falls below the above mentioned temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 (if the thermal oxidizer OX-1 is used to comply with the VOC limitation under Condition D.1.1), D.1.3, and D.1.7.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test. When, for any one reading, the duct pressure or fan amperage is outside the appropriate range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A duct pressure or fan amperage reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limitations established in Condition D.1.1, D.1.2, D.1.3, and D.1.6.

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

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

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

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

(3) The monthly cleanup solvent usage;

(4) The total VOC input for each month and each compliance period.

(5) The total VOC emitted for each month and each compliance period.

(6) Records indicating when VOC emissions were controlled by the thermal oxidizer OX-1 and when VOC emissions were not controlled by the thermal oxidizer OX-1.

(b) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain records in accordance with the following:

(1) The 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. The Permittee shall include in its daily record when a temperature reading is not taken and the reason for the lack of temperature reading (e.g., the thermal oxidizer was not operating).

(2) Daily records of the duct pressure or fan amperage. The Permittee shall include in its daily record when a pressure or fan amperage reading is not taken and the reason for the lack of pressure or fan amperage reading (e.g., the thermal oxidizer was not operating).

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

D.1.12 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2, and D.1.6 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no 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 reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION E.1 OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) adhesive coater and laminator, identified as CO-1, approved for construction in 2013, with a maximum capacity of 40.5 gallons of adhesive per hour, utilizing roll coating application, using one (1) natural gas-fired thermal oxidizer (OX-1) with a maximum heat input capacity of 2.75 MMBtu per hour to control volatile organic compound emissions, and exhausting to stack OX1. When using water based solvents, the adhesive coater and laminator may vent directly to a bypass stack OX2 without the use of the thermal oxidizer.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations [40 CFR Part 60, Subpart A][326 IAC 12-1]

Pursuant to 40 CFR 60.4200, 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, in accordance with schedule in 40 CFR 60 Subpart RR.

E.1.2 New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations [40 CFR Part 60, Subpart RR] [326 IAC 12]

The Permittee, which engages in adhesive application and lamination for automotive interior components, shall comply with the following provisions of 40 CFR Part 60, Subpart RR (included as Attachment A of this permit), which are incorporated by reference as 326 IAC 12:

(a) 40 CFR 60.440
(b) 40 CFR 60.441
(c) 40 CFR 60.445(d), (e), and (h)

Compliance with Condition D.1.2 shall limit the VOC input to the adhesive coater and laminator CO-1 to less than 50 tons per 12 consecutive month period, and shall render the requirements of 40 CFR 60.442(a) not applicable.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Innovative Coating Solutions, Inc.
Source Address: 7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268
FESOP Permit No.: F097-33462-00717

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:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Innovative Coating Solutions, Inc.
Source Address: 7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268
FESOP Permit No.: F097-33462-00717

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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

FESOP Quarterly Report

Source Name: Innovative Coating Solutions, Inc.
Source Address: 7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268
FESOP Permit No.: F097-33462-00717
Facility: Adhesive Coater and Laminator CO-1
Parameter: VOC Emissions
Limit: The VOC emissions (after control) from the adhesive coater and laminator CO-1, shall not exceed 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

In order to determine compliance with this VOC limit, the Permittee shall calculate the VOC emissions using the following equation:

Total VOC emitted = [VOC input to CO-1 x (1 - control efficiency of thermal oxidizer OX-1 from the most recent valid compliance demonstration)]

When the thermal oxidizer OX-1 is not operating, the control efficiency = 0.

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

FESOP Quarterly Report

Source Name: Innovative Coating Solutions, Inc.
Source Address: 7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268
FESOP Permit No.: F097-33462-00717
Facility: Adhesive Coater and Laminator CO-1
Parameter: VOC Input
Limit: The total input of VOC, including solvents, coatings, and adhesives, delivered to the adhesive coater and laminator CO-1 shall be less than fifty (50) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Innovative Coating Solutions, Inc.
Source Address: 7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268
FESOP Permit No.: F097-33462-00717

Months: _____ to _____ Year: _____

Page 1 of 2

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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Innovative Coating Solutions, Inc.
7950 Georgetown Road, Suite 200
Indianapolis, Indiana 46268

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Innovative Coating Solutions, Inc. 7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268, completed construction of the automotive interior components manufacturing facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on July 24, 2013, and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F097-33462-00717, Plant ID No. 097-00717 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Attachment A

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

Subpart RR—Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

Source: 48 FR 48375, Oct. 18, 1983, unless otherwise noted.

§ 60.441 Definitions and symbols.

(a) Except as otherwise required by the context, terms used in this subpart are defined in the Act, in subpart A of this part, or in this section as follows:

Coating applicator means an apparatus used to apply a surface coating to a continuous web.

Coating line means any number or combination of adhesive, release, or precoat coating applicators, flashoff areas, and ovens which coat a continuous web, located between a web unwind station and a web rewind station, to produce pressure sensitive tape and label materials.

Coating solids applied means the solids content of the coated adhesive, release, or precoat as measured by Method 24.

Flashoff area means the portion of a coating line after the coating applicator and usually before the oven entrance.

Fugitive volatile organic compounds means any volatile organic compounds which are emitted from the coating applicator and flashoff areas and are not emitted in the oven.

Hood or enclosure means any device used to capture fugitive volatile organic compounds.

Oven means a chamber which uses heat or irradiation to bake, cure, polymerize, or dry a surface coating.

Precoat means a coating operation in which a coating other than an adhesive or release is applied to a surface during the production of a pressure sensitive tape or label product.

Solvent applied in the coating means all organic solvent contained in the adhesive, release, and precoat formulations that is metered into the coating applicator from the formulation area.

Total enclosure means a structure or building around the coating applicator and flashoff area or the entire coating line for the purpose of confining and totally capturing fugitive VOC emissions.

VOC means volatile organic compound.

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

a=the gas stream vents exiting the emission control device.

b=the gas stream vents entering the emission control device.

C_{aj} =the concentration of VOC (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.

C_{bi} =the concentration of VOC (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.

C_{fk} =the concentration of VOC (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.

G=the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month.

M_{ci} =the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records.

M_r =the total mass (kg) of solvent recovered for a calendar month.

Q_{aj} =the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic meters per hour.

Q_{bi} =the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic meters per hour.

Q_{fk} =the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic meters per hour.

R=the overall VOC emission reduction achieved for a calendar month (in percent).

R_q =the required overall VOC emission reduction (in percent).

W_{oi} =the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

W_{si} =the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.442 Standard for volatile organic compounds.

(a) On and after the date on which the performance test required by § 60.8 has been completed each owner or operator subject to this subpart shall:

(1) Cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or

(2) Demonstrate for each affected facility;

(i) A 90 percent overall VOC emission reduction as calculated over a calendar month; or

(ii) The percent overall VOC emission reduction specified in § 60.443(b) as calculated over a calendar month.

§ 60.443 Compliance provisions.

(a) To determine compliance with § 60.442 the owner or operator of the affected facility shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

(1) Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

(2) Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

(3) For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with § 60.442(a)(1).

(b) To determine compliance with § 60.442(a)(2), the owner or operator shall calculate the required overall VOC emission reduction according to the following equation:

$$R_q = \frac{G - 0.20}{G} \times 100$$

If R_q is less than or equal to 90 percent, then the required overall VOC emission reduction is R_q . If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

(c) Where compliance with the emission limits specified in § 60.442(a)(2) is achieved through the use of a solvent recovery system, the owner or operator shall determine the overall VOC emission reduction for a one calendar month period by the following equation:

$$R = \sum_{i=1}^{n} \frac{M_r}{W_{oi} M_{ci}} \times 100$$

If the R value is equal to or greater than the R_q value specified in paragraph (b) of this section, then compliance with § 60.442(a)(2) is demonstrated.

(d) Where compliance with the emission limit specified in § 60.442(a)(2) is achieved through the use of a solvent destruction device, the owner or operator shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in paragraph (b) of this section to the overall VOC emission reduction demonstrated in the most recent performance test which complied with § 60.442(a)(2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with § 60.442(a)(2).

(e) Where compliance with § 60.442(a)(2) is achieved through the use of a solvent destruction device, the owner or operator shall continuously record the destruction device combustion temperature during coating operations for thermal incineration destruction devices or the gas temperature upstream and downstream of the incinerator catalyst bed during coating operations for catalytic incineration destruction

devices. For thermal incineration destruction devices the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with § 60.442(a)(2). For catalytic incineration destruction devices, the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device immediately before the catalyst bed is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with § 60.442(a)(2), and all 3-hour periods (during actual coating operations) during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference of the device during the most recent performance test complying with § 60.442(a)(2).

(f) After the initial performance test required for all affected facilities under § 60.8, compliance with the VOC emission limitation and percentage reduction requirements under § 60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.

(g) If a common emission control device is used to recover or destroy solvent from more than one affected facility, the performance of that control device is assumed to be equal for each of the affected facilities. Compliance with § 60.442(a)(2) is determined by the methods specified in paragraphs (c) and (d) of this section and is performed simultaneously on all affected facilities.

(h) If a common emission control device is used to recover solvent from an existing facility (or facilities) as well as from an affected facility (or facilities), the overall VOC emission reduction for the affected facility (or facilities), for the purpose of compliance, shall be determined by the following procedures:

(1) The owner or operator of the existing facility (or facilities) shall determine the mass of solvent recovered for a calendar month period from the existing facility (or facilities) prior to the connection of the affected facility (or facilities) to the emission control device.

(2) The affected facility (or facilities) shall then be connected to the emission control device.

(3) The owner or operator shall determine the total mass of solvent recovered from both the existing and affected facilities over a calendar month period. The mass of solvent determined in paragraph (h)(1) of this section from the existing facility shall be subtracted from the total mass of recovered solvent to obtain the mass of solvent recovered from the affected facility (or facilities). The overall VOC emission reduction of the affected facility (or facilities) can then be determined as specified in paragraph (c) of this section.

(i) If a common emission control device(s) is used to destruct solvent from an existing facility (or facilities) as well as from an affected facility (or facilities), the overall VOC emission reduction for the affected facility (or facilities), for the purpose of compliance, shall be determined by the following procedures:

(1) The owner or operator shall operate the emission control device with both the existing and affected facilities connected.

(2) The concentration of VOC (in parts per million by volume) after the common emission control device shall be determined as specified in § 60.444(c). This concentration is used in the calculation of compliance for both the existing and affected facilities.

(3) The volumetric flow out of the common control device attributable to the affected facility (or facilities) shall be calculated by first determining the ratio of the volumetric flow entering the common control device attributable to the affected facility (facilities) to the total volumetric flow

entering the common control device from both existing and affected facilities. The multiplication of this ratio by the total volumetric flow out of the common control device yields the flow attributable to the affected facility (facilities). Compliance is determined by the use of the equation specified in § 60.444(c).

(j) Startups and shutdowns are normal operation for this source category. Emissions from these operations are to be included when determining if the standard specified at § 60.442(a)(2) is being attained.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.444 Performance test procedures.

(a) The performance test for affected facilities complying with § 60.442 without the use of add-on controls shall be identical to the procedures specified in § 60.443(a).

(b) The performance test for affected facilities controlled by a solvent recovery device shall be conducted as follows:

(1) The performance test shall be a one calendar month test and not the average of three runs as specified in § 60.8(f).

(2) The weighted average mass of VOC per mass of coating solids applied for a one calendar month period shall be determined as specified in § 60.443(a) (1) and (2).

(3) Calculate the required percent overall VOC emission reduction as specified in § 60.443(b).

(4) Inventory VOC usage and VOC recovery for a one calendar month period.

(5) Determine the percent overall VOC emission reduction as specified in § 60.443(c).

(c) The performance test for affected facilities controlled by a solvent destruction device shall be conducted as follows:

(1) The performance of the solvent destruction device shall be determined by averaging the results of three test runs as specified in § 60.8(f).

(2) Determine for each affected facility prior to each test run the weighted average mass of VOC per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in § 60.443(a). In this application the quantities of W_{oi} , W_{si} , and M_{ci} shall be determined for the time period of each test run and not a calendar month as specified in § 60.441.

(3) Calculate the required percent overall VOC emission reduction as specified in § 60.443(b).

(4) Determine the percent overall VOC emission reduction of the solvent destruction device by the following equation and procedures:

$$R = \frac{\sum_{i=1}^{n} Q_{bi}C_{bi} - \sum_{j=1}^{m} Q_{aj}C_{aj}}{\sum_{i=1}^{n} Q_{bi}C_{bi} + \sum_{k=1}^{p} Q_{ak}C_{ak}} \times 100$$

(i) The owner or operator of the affected facility shall construct the overall 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 § 60.446(b).

(ii) The owner or operator of an affected facility shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive VOC emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is totally capturing fugitive VOC emissions, then no additional total enclosure will be required for the performance test.

(iii) For each affected facility where the value of R is greater than or equal to the value of R_q calculated in § 60.443(b), compliance with § 60.442(a)(2) is demonstrated.

§ 60.445 Monitoring of operations and recordkeeping.

(a) The owner or operator of an affected facility subject to this subpart shall maintain a calendar month record of all coatings used and the results of the reference test method specified in § 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.

(b) The owner or operator of an affected facility controlled by a solvent recovery device shall maintain a calendar month record of the amount of solvent applied in the coating at each affected facility.

(c) The owner or operator of an affected facility controlled by a solvent recovery device shall install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of solvent recovered by the device over a calendar month period. The monitoring device shall be accurate within ±2.0 percent. The owner or operator shall maintain a calendar month record of the amount of solvent recovered by the device.

(d) The owner or operator of an affected facility operating at the conditions specified in § 60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

(e) The owner or operator of an affected facility controlled by a thermal incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5 °C.

(f) The owner or operator of an affected facility controlled by a catalytic incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed.

(g) The owner or operator of an affected facility controlled by a solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. No continuous monitor shall be required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system.

(h) Records of the measurements required in §§ 60.443 and 60.445 must be retained for at least two years following the date of the measurements.

§ 60.446 Test methods and procedures.

(a) The VOC content per unit of coating solids applied and compliance with § 60.422(a)(1) shall be determined by either Method 24 and the equations specified in § 60.443 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Administrator may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

(b) Method 25 shall be used to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere. Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flowrate, molecular weight, and moisture of all sampled gas streams. For Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

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

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.447 Reporting requirements.

(a) For all affected facilities subject to compliance with § 60.442, the performance test data and results from the performance test shall be submitted to the Administrator as specified in § 60.8(a) of the General Provisions (40 CFR part 60, subpart A).

(b) Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator of exceedances of the VOC emission limits specified in § 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(c) 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 § 60.443(e). If no such periods occur, the owner or operator shall state this in the report.

(d) The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

[48 FR 48375, Oct. 18, 1983, as amended at 55 FR 51383, Dec. 13, 1990]

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	**Innovative Coating Solutions, Inc.**
Source Location:	**7950 Georgetown Rd., Suite 200, Indianapolis, IN 46268**
County:	**Marion**
SIC Code:	**3714 (Motor Parts and Accessories)**
Operation Permit No.:	**F097-33462-00717**
Permit Reviewer:	**Brian Wright**

On August 28, 2013, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Innovative Coating Solutions, Inc. had applied for a New Source Construction and FESOP to permit the construction and operation of a stationary automotive interior components manufacturing facility. The notice also stated that the OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

OAQ received comments from Cindy Gill, a local resident and property owner.

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

Comment 1:

> I am a concerned citizen residing at 4730 W 79th St. Indianapolis, IN 46268. My home will be in close proximity to the company Innovative Coating Solution Inc. who plans to operate equipment that will emit air pollutants. My family and I would not like to be at risk of being affected in any way by environmental hazards and ask that the air permit being requested by the company mentioned is denied by the Indiana Department of Environmental Management. Please, I am thinking not only about my family but also about the families in our neighborhood whose health can also potentially be at risk should this air permit be granted. My family and I are a young family, we love our city and have decided to settle here instead of anywhere else in the United States because we know Indiana cares about our environment and the health our of its citizens. In the future, I wish to see my children walk and play around our home and I hope to have peace of mind, knowing that my children are safe from any kind of hazard. PLEASE, I ask you to consider this and to NOT GRANT a New Source Construction and FESOP permit.

Response to Comment 1:

IDEM's Office of Air Quality (OAQ) recognizes that air pollution is of great personal concern to the commenter. The permit requires the source to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit. IDEM encourages all sources in the state to take measures to reduce negative impacts to the environment. However, IDEM has no authority to create any permit limits or measures in excess of what is legally required for a regulated source.

The mission of IDEM's Office of Air Quality is to assure all Hoosiers ambient air quality that meets the National Ambient Air Quality Standards (NAAQS). The NAAQS are often referred to as the federal health standards for outdoor air. The federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set NAAQS for six criteria pollutants, ozone, particulate matter, nitrogen oxides, sulfur dioxide, carbon monoxide and lead. These standards are set at levels that protect human health, including the health of sensitive persons, such as asthmatics, children and the elderly. Montgomery County is in attainment status for all the criteria pollutants. The source's emissions will not cause or contribute to any violation of the NAAQS.

More information about these pollutants is available at http://www.epa.gov/air/airpollutants.html on U.S. EPA's website. The complete table of the NAAQS can be found at http://www.epa.gov/air/criteria.html. Detailed information about the health effects of these common pollutants is available at http://www.epa.gov/air/urbanair/ on IDEM's website. IDEM OAQ conducts sampling of the ambient air at monitoring stations around Indiana. This air monitoring is conducted to measure whether the NAAQS are being met. Information about Indiana's air monitoring system and monitoring results is available at http://www.IN.gov/idem/4116.htm. Information about current and expected air pollution levels is on IDEM's SmogWatch site at http://www.IN.gov/apps/idem/smog/. More information about attainment and nonattainment areas in Indiana is available at http://www.in.gov/idem/airquality/2339.htm.

The Indiana air permitting requirements that are applicable to this facility are part of our state implementation plan (SIP) that is approved by the U.S. EPA. Environmental laws are enacted by the Indiana legislature. The legislature has also given rulemaking authority to the Indiana Air Pollution Control Board. More information about the Indiana Air Pollution Control Board and the rulemaking process is available at http://www.in.gov/idem/4087.htm and http://www.in.gov/idem/4697.htm.

IDEM OAQ's Compliance and Enforcement Branch uses all compliance tools and resources available to improve air quality by ensuring that all air pollution sources are in compliance with all state and federal air pollution laws, rules and permits. The branch determines compliance of regulated sources of air emissions by inspecting, monitoring, testing, and reviewing records. The branch has inspectors that conduct inspections, respond to complaints, provide compliance assistance to sources and provide input on permits and rules.

The IDEM OAQ air compliance inspector for this source is Clinton Pflum. Mr. Clinton Pflum may be reached by telephone at (317) 232-8438, toll free (800) 451-6027 extension 2-8438, FAX (317) 233-6865. Citizens should contact the IDEM OAQ air compliance inspector if there are any air compliance related concerns with this facility. Environmental complaints may also be filed on-line at http://www.in.gov/idem/5274.htm or by calling IDEM's Complaint Coordinator at (800) 451-6027, extension 2-4464.

No changes were made as a result of this comment.

IDEM Contact

(a) Questions regarding this proposed FESOP can be directed to Brian Wright 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) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	**Innovative Coating Solutions, Inc.**
Source Location:	**7950 Georgetown Road, Suite 200, Indianapolis, IN 46268**
County:	**Marion**
SIC Code:	**3714 (Motor Vehicle Parts and Accessories)**
Operation Permit No.:	**F097-33462-00717**
Permit Reviewer:	**Brian Wright**

OnJuly 24, 2013, the Office of Air Quality (OAQ) received an application from Innovative Coating Solutions, Inc. related to the construction and operation of a new stationary automotive interior components manufacturing facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Attainment effective November 8, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Unclassifiable or attainment effective federally July 11, 2013, for PM2.5.	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as

attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Marion County has been classified as nonattainment for $PM_{2.5}$ in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Marion 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.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Innovative Coating Solutions, Inc. on July 24, 2013, relating to the new construction of a new stationary automotive interior components manufacturing facility.

The following is a list of the new emission units and pollution control devices:

(a) One (1) adhesive coater and laminator, identified as CO-1, approved for construction in 2013, with a maximum capacity of 40.5 gallons of adhesive per hour, utilizing roll coating application, using one (1) natural gas-fired thermal oxidizer (OX-1) with a maximum heat input capacity of 2.75 MMBtu per hour to control volatile organic compound emissions, and exhausting to stack OX1. When using water based solvents, the adhesive coater and laminator may vent directly to a bypass stack OX2 without the use of the thermal oxidizer

(b) One (1) natural gas-fired oven, identified as OV-1, approved for construction in 2013, with a maximum heat input capacity of 1.50 MMBtu per hour, and exhausting to stack OV1.

(c) Insignificant activities consisting of the following:

(1) Four (4) natural gas fired space heaters, identified as SP1 through SP4, approved for construction in 2013, each with a maximum heat capacity of 0.8 MMBtu per hour, using no controls, and exhausting outdoors.

(2) One (1) natural gas fired make-up unit, identified as Hastings MUA, approved for construction in 2013, with a maximum heat input capacity of 1.27 MMBtu per hour, using no controls, and exhausting outdoors.

(3) Two (2) natural gas fired furnaces, identified as Furnace 1 and Furnace 2, approved for construction in 2013, each with a maximum heat input capacity of 0.125 MMBtu per hour, and exhausting outdoors.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.07
PM10[(1)]	0.29
PM2.5	0.29
SO_2	0.02
NO_x	3.85
VOC	836.79
CO	3.24
GHGs as CO_2e	4650

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	0.07 Hexane
TOTAL HAPs	**0.07**

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, 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 FESOP (tons/year)									
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Adhesive Coater and Laminator CO-1	0.00	0.00	0.00	0.00	0.00	< 50***	0.00	0.00	0.00	--
Natural Gas Combustion (OV-1, OX-1, and SP1)	0.07	0.29	0.29	0.02	3.85	0.21	3.24	4650	0.07	0.07 (Hexane)
Total PTE of Entire Source	**0.07**	**0.29**	**0.29**	**0.02**	**3.85**	**< 50.21**	**3.24**	**4650**	**0.07**	**0.07 (Hexane)**
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.
***In order to render the requirements of 40 CFR 60.442 (Standard for volatile organic compounds under the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations) not applicable, the total input of VOC, including solvents, coatings, and adhesives, delivered to the adhesive coater and laminator CO-1 shall be less than fifty (50) tons per twelve (12) consecutive month period.

(a) FESOP and PSD Minor Status

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP). Furthermore, the new source is not subject to the limit requirements under 40 CFR 60.442(a) and any associated sections (New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations), since the source will limit their VOC to less than 50 tons per twelve month period.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the VOC emissions (after control) from the adhesive coater and laminator CO-1, shall not exceed 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOCs from all other emission units at this source, shall limit the source-wide VOC emissions to less than 100 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source

This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit VOCs is limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse

gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included for the thermal oxidizer, the oven, the space heaters, the air make-up unit, and the furnaces since they each are not considered a steam generating unit as defined by 40 CFR 60.41c and each unit has a heat input capacity of less than ten (10) MMBtu per hour.

(b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat metal furniture.

(c) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since the source does not coat automobiles or light duty trucks and are not located in an automobile or light duty truck assembly plant.

(d) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not included in the permit, since the facility does not utilize a rotogravure printing press.

(e) This source is subject to the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR 60, Subpart RR) (326 IAC 12), because this source contains a coating line that utilizes an adhesive applicator that coats a continuous web to produce automotive interior component materials.

The units subject to this rule include the following:

One (1) adhesive coater and laminator, identified as CO-1.

Applicable portions of the NSPS are the following:

(1) 40 CFR 60.440
(2) 40 CFR 60.441
(3) 40 CFR 60.445(d), (e), and (h)

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the unit except as otherwise specified in 40 CFR 60, Subpart RR.

In order to render the requirements of 40 CFR 60.442 (Standard for volatile organic compounds under the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations) not applicable, the total input of VOC, including solvents, coatings, and adhesives, delivered to the adhesive coater and laminator CO-1 shall be less than fifty (50) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC input to the adhesive coater and laminator CO-1 to less than 50 tons per 12 consecutive month period, and shall render the requirements of 40 CFR 60.442 (Standard for volatile organic compounds under the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations) not applicable.

(f) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since the facility does not coat large appliances.

(g) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are not included in the permit, since the facility does not coat metal coils.

(h) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (326 IAC 12), are not included in the permit, since the facility does not coat beverage cans.

(i) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF (326 IAC 12), are not included in the permit, since the facility does not coat flexible vinyl or urethane products.

(j) The requirements of the New Source Performance Standard for Magnetic Tape Coating Facilities, 40 CFR 60, Subpart SSS (326 IAC 12), are not included in the permit, since the facility does not coat magnetic tape.

(k) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT, (326 IAC 12), are not included in the permit, since the facility does not coat plastic parts for business machines.

(l) The requirements of the New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (326 IAC 12), are not included in the permit, since the facility does not utilize a polymeric coating application.

(m) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII, (326 IAC 20-85), are not included in the permit, since this source does not coat automobiles or light duty trucks and is not located at a major source of HAPs.

(o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paper and Other Web Coating, 40 CFR 63.3280 Subpart JJJJ, (326 IAC 20-65), are not included in the permit, since this source is not located at a major source of HAPs.

(p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Cans, 40 CFR 63.3480, Subpart KKKK, (326 IAC 20-86), are not included in the permit, since this source does not coat metal cans and is not located at a major source of HAPs.

(q) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM, (326 IAC 20-80), are not included in the permit, since this source does not coat miscellaneous metal parts or products and is not located at a major source of HAPs. This source coats web paper for automotive interior components.

(r) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Large Appliances, 40 CFR 63.4080, Subpart NNNN, (326 IAC 20-63), are not

included in the permit, since this source does not coat large appliances and is not located at a major source of HAPs.

(s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP, (326 IAC 20-81), are not included in the permit, since this source does not coat plastic parts or products and is not located at a major source of HAPs. This source coats web paper for automotive interior components.

(t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63.4680, Subpart QQQQ, (326 IAC 20-79), are not included in the permit, since this source does not coat wood building products and is not located at a major source of HAPs.

(u) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR, (326 IAC 20-78), are not included in the permit, since this source does not coat metal furniture and is not located at a major source of HAPs.

(v) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Coil, 40 CFR 63.5080, Subpart SSSS, (326 IAC 20-64), are not included in the permit, since this source does not coat metal coil and is not located at a major source of HAPs.

(w) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD, are not included in the permit, since this source is not located in a major source of HAPs.

(x) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included in the permit, since this source does not have paint stripping or autobody refinishing operations, nor does the surface coatings contain compounds of chromium, lead, manganese, nickel, or cadmium.

(y) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJJ, are not included in the permit, since this source does not have industrial, commercial, or institutional boilers.

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

Compliance Assurance Monitoring (CAM)

(aa) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

(a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(c) 326 IAC 2-3 (Emission Offset)
This source is not subject to the requirements of 326 IAC 2-3 (Emission Offset), since Marion County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants.

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

(1) Opacity shall not exceed an average of forty percent (30%) in 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.

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

(h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because this source does not have potential fugitive particulate emissions equal to or greater than 25 tons per year.

(i) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
The source is not subject to the requirements of 326 IAC 6.5, since the source does not have the potential to emit particulate matter equal to or greater than 10 tons per year.

(j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Adhesive coater and laminator CO-1

(l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(6), the requirements of 326 IAC 6-3-2 are not applicable to the adhesive coater and laminator CO-1, since the coater and laminator uses roll coating and is thus exempt from the requirements.

(m) 326 IAC 8-1-6 (Volatile Organic Compounds: New Facilities General Reduction Requirements)
Pursuant to 326 IAC 8-1-6(3)(A), the adhesive coater and laminator (CO-1) is exempt from the requirements of 326 IAC 8-1-6, because it is subject to the requirements of 326 IAC 8-2-5.

(n) 326 IAC 8-2-5 (Volatile Organic Compounds: Paper Coating Operations)
Pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-5 are applicable to the adhesive coater and laminator CO-1, since this facility was constructed after January 1, 1990, has potential emissions of greater than fifteen (15) pounds per day of VOC before add-on controls, and utilizes web coating of paper.

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of thirty-five hundredths (0.35) kilogram per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from the adhesive coater and laminator CO-1.

When using the thermal oxidizer OX-1 to comply with this VOC content limitation, the Permittee shall operate the thermal oxidizer OX-1 at all times that the adhesive coater and laminator CO-1 is operating and the minimum required overall efficiency of the thermal oxidizer shall be calculated as follows as described in 326 IAC 8-1-2(b):

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

Where:

E = Equivalent emission limit in pounds per gallon of solids, as applied

L= Applicable emission limit in pounds of VOC per gallon of coating 2.9 pounds of VOC per gallon less water

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

A solvent density of seven and thrity-six hundreth (7.36) pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

E= 2.9 / [1 - (2.9/7.36)] = 4.79 pounds per gallon of solids

The minimum overal control efficiency of the oxidizer has been calculated as follows as described in 326 IAC 8-1-2(c).

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

Where:

V= the actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content, as applied to the 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 gallons of coating solids as applied;

E= 4.79 pounds per gallon of solids; and

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

(o) There are no other 326 IAC 8 Rules that are applicable to the adhesive coater and laminator CO-1.

Natural Gas Combustion: Thermal Oxidizer OX-1, Oven OV-1, Space Heaters SP1 through SP4, Air Make-Up Unit, and Furnaces 1 and 2

(p) 326 IAC 6-2-4 (Particulate Matter Limitations for Indirect Heating Units)
Pursuant to 326 IAC 6-2-1, the requirements of 326 IAC 6-2-4 are not applicable to the thermal oxidizer, the oven, the space heaters, the air make-up unit, and the furnaces since they are not sources of indirect heating.

(q) 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to the thermal oxidizer, the oven, the space heaters, the air make-up unit, and the furnaces, since each have particulate emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.

(r) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the thermal oxidizer, the oven, the space heaters, the air make-up unit, and the furnaces are each not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

(s) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The thermal oxidizer, the oven, the space heaters, the air make-up unit, and the furnaces are each not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

(t) There are no 326 IAC 8 Rules that are applicable to these units.

Compliance Determination, Monitoring and Testing Requirements

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/ID	Control	Operating Parameters	Monitoring Frequency	Range	Excursions and Exceedances
Adhesive Coater and Laminator CO-1	Thermal Oxidizer OX-1	Combustion Chamber Temperature	Continuous	Normal-Abnormal	Response Steps
		Duct Pressure or Fan Amperage	Daily		

(b) The testing requirements applicable to this source are as follows:

Testing Requirements				
Emission Unit	**Control Device**	**Pollutant**	**Timeframe for Testing**	**Frequency of Testing**
Adhesive Coater and Laminator CO-1	Thermal Oxidizer OX-1	VOC	Not later than one hundred and eighty (180) days after initial startup of the adhesive coater and laminator CO-1	Once every 5 years

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on July 24, 2013.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F097-33462-00717. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Brian Wright 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) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.

(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.in.gov/idem

Appendix A: Emissions Calculations
Summary of Potential Emissions

Company Name: Innovative Coating Solutions, Inc.
Source Address: 7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268
Permit Number: F097-33462-00717
Reviewer: Brian Wright

Uncontrolled/Unlimited Potential to Emit (tons per year)											
Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO2e	HAP	Worst Single HAP	
Adhesive Coater and Laminator (CO-1)	0.00	0.00	0.00	0.00	0.00	836.58	0.00	0	0.00	0.00	--
Natural Gas Combustion	0.07	0.29	0.29	0.02	3.85	0.21	3.24	4650	0.07	0.07	Hexane
Total	**0.07**	**0.29**	**0.29**	**0.02**	**3.85**	**836.79**	**3.24**	**4650**	**0.07**	**0.07**	**Hexane**

Limited Potential to Emit (tons per year)											
Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO2e	HAP	Worst Single HAP	
Adhesive Coater and Laminator (CO-1)	0.00	0.00	0.00	0.00	0.00	< 50	0.00	0	0.00	0.00	--
Natural Gas Combustion	0.07	0.29	0.29	0.02	3.85	0.21	3.24	4650	0.07	0.07	Hexane
Total	**0.07**	**0.29**	**0.29**	**0.02**	**3.85**	**< 50.21**	**3.24**	**4650**	**0.07**	**0.07**	**Hexane**

Controlled Potential to Emit (tons per year)											
Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO2e	HAP	Worst Single HAP	
Adhesive Coater and Laminator (CO-1)	0.00	0.00	0.00	0.00	0.00	41.83	0.00	0	0.00	0.00	--
Natural Gas Combustion	0.07	0.29	0.29	0.02	3.85	0.21	3.24	4650	0.07	0.07	Hexane
Total	**0.07**	**0.29**	**0.29**	**0.02**	**3.85**	**42.04**	**3.24**	**4650**	**0.07**	**0.07**	**Hexane**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Adhesive Coater and Laminator (CO-1)

Company Name: **Innovative Coating Solutions, Inc.**
Address City IN Zip: **7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268**
Permit Number: **F097-33462-00717**
Reviewer: **Brian Wright**

Uncontrolled Potential to Emit (PTE)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Uncontrolled Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency**
Oribain BPS6080TX (main adhesive)	7.8	60.00%	0.0%	60.0%	0.0%	40.00%	39.5								
Oribain BHS8515TX (hardener)	8.5	70.00%	0.0%	70.0%	0.0%	40.00%	1.0								
As Applied*	**7.8**	**60.30%**	**0.0%**	**60.3%**	**0.0%**	**40.00%**	**40.5**	**4.72**	**4.72**	**191.00**	**4584.01**	**836.58**	**0.00**	**11.79**	**100%**
Saivinol AT-48 (water based)	**8.5**	42.00%	42.0%	0.0%	42.0%	58.00%	40.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
									Total	**191.00**	**4584.01**	**836.58**	**0.00**		

Controlled Potential to Emit (PTE)

Material	Thermal Oxidizer Control Efficiency %	Controlled Potential VOC tons per year
Oribain BPS6080TX (main adhesive)		
Oribain BHS8515TX (hardener)		
As Applied*	**95%**	**41.83**
	Total	**41.83**

METHODOLOGY
* The source uses a mixture of 97% adhesive to 3% hardener
**The coater and laminator uses roll coating application with a transfer efficiency of 100%
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
The main adhesive and hardener do not contain HAPs.

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

Company Name: **Innovative Coating Solutions, Inc.**
Address City IN Zip: **7950 Georgetown Road, Suite 200, Indianapolis, Indiana 46268**
Permit Number: **F097-33462-00717**
Reviewer: **Brian Wright**

Emission Units ID	Heat Input Capacity (MMBtu/hr)	Number of Units	Total Heat Input Capacity
Thermal Oxidizer OX-1	2.75	1	2.75
Oven OV-1	1.50	1	1.50
Space Heaters SP1 through SP4	0.80	4	3.20
Make-Up Unit (Hastings MUA)	1.27	1	1.27
Furnaces 1 and 2	0.125	2	0.25
Total	**6.45**		**8.97**

HHV mmBtu mmscf	Potential Throughput MMCF/yr
1020	77.0

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.07	0.29	0.29	0.02	3.85	0.21	3.24

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 2 for HAPs emissions calculations.

Hazardous Air Pollutants (HAPs)

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyd	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	8.1E-05	4.6E-05	2.9E-03	6.9E-02	1.3E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.9E-05	4.2E-05	5.4E-05	1.5E-05	8.1E-05

Methodology is the same as page 1.

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

Greenhouse Gases (GHGs)

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	4,622	0.09	0.08
Summed Potential Emissions in tons/yr	4,622		
CO2e Total in tons/yr	4,650		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Kenji Mochizuki
Innovative Coating Solutions
7950 Georgetown Rd, Ste 200
Indianapolis, IN 46268

DATE: October 4, 2013

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

SUBJECT: Final Decision
New Source FESOP
097 - 33462 - 00717

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:
Walter Koucky Cornerstone Environmental
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.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

October 4, 2013

TO: Indianapolis Central Library Branch

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

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

Applicant Name: Innovative Coating Solutions
Permit Number: 097 - 33462 - 00717

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 6/13/2013

Mail Code 61-53

IDEM Staff	LPOGOST 10/4/2013 Innovative Coating Solutions, Inc. 097 - 33462 - 00717 /final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)*									
3		Indianapolis Central Library Branch 40 East St. Clair Street Indianapolis IN 46204 *(Library)*									
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)*									
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)*									
6		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 *(Local Official)*									
7		Walter Koucky Cornerstone Environmental 880 Lennox Court Zionsville IN 46077 *(Consultant)*									
8		Morris Property One, LLC 5009 W 81st Street Indianapolis IN 46268 *(Affected Party)*									
9		Gurdial Singh 4708 W 79th Street Indianapolis IN 46268 *(Affected Party)*									
10		Judd Investment, LLC 4825 W 79th Street Indianapolis IN 46268 *(Affected Party)*									
11		Peterson Engineering 4950 W 79th Street Indianapolis IN 46268 *(Affected Party)*									
12		Pauline Bell 8007 Georgetown Road Indianapolis IN 46268 *(Affected Party)*									
13		A-1 Hoosier Storage 8040 Georgetown Road Indianapolis IN 46268 (Affected Party)									
14		Patrick Lindley 8070 Georgetown Road Indianapolis IN 46268 *(Affected Party)*									
15		James Patty 7919 Georgetown Road Indianapolis IN 46268 *(Affected Party)*									

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Mail Code 61-53

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1		James 7945 Georgetown Road Indianapolis IN 46268 (Affected Party)									
2		Michael Wilkerson 8027 Georgetown Road Indianapolis IN 46268 *(Affected Party)*									
3		Reality Carpet, Inc. 7998 Georgetown Road, Suite 500 Indianapolis IN 46268 *(Affected Party)*									
4		Quality Services Group 7920 Georgetown Road, Suite 400 Indianapolis IN 46268 *(Affected Party)*									
5		Em-Roe Sporting Good Co. 7920 Georgetown Road, Suite 800 Indianapolis IN 46268 *(Affected Party)*									
6		Music Travel Consultants 7920 Georgetown Road, Suite 700 Indianapolis IN 46268 *(Affected Party)*									
7		Cindy Perez Gil 4730 W 79th Street Indianapolis IN 46268 *(Affected Party)*									
8		Lifetouch Prestige Studios 7998 Georgetown Road Indianapolis IN 46268 *(Affected Party)*									
9		AMA USA, Inc. 7998 Georgetown Road Indianapolis IN 46268 *(Affected Party)*									
10		Wayne Taylor Racing, LLC 7950 Georgetown Road, Suite 200 Indianapolis IN 46268 *(Affected Party)*									
11		Caine Johnson 4735 Clayburn Road Indianapolis IN 46268 *(Affected Party)*									
12		Crystal Offutt 4725 Clayburn Road Indianapolis IN 46268 *(Affected Party)*									
13		Francisco Vidana 4715 Clayburn Road Indianapolis IN 46268 (Affected Party)									
14											
15											

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