



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant
DATE: November 27, 2013
RE: EIS Fibercoating, Inc. / 017-33765-00039
FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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-MOD.dot 6/13/2013



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Ms. Megan Schultz
EIS Fibercoating, Inc.
616 E. Main St.
Logansport, IN 46947

November 27, 2013

Re: 017-33765-00039
Second Minor Revision to
F017-31585-00039

Dear Ms. Schultz:

EIS Fibercoating, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Second Renewal No. F017-31585-00039 on November 20, 2012, for a stationary rubber, plastic parts and sheet goods coating and flocking operation located at 616 East Main Street, Logansport, Indiana 46947. On October 9, 2013, the Office of Air Quality (OAQ) received an application from the source. On November 24, 2013, OAQ received further information requesting the following:

- (1) Removal of Graphics Line 2 (GL2).
- (2) Construction and operation of one new flock adhesive line (L6)
- (3) Amend the description of the stack for Lines 4 and 5 since they both share a common stack.

The attached Technical Support Document (TSD) provides additional explanation of the changes to the source and permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-8-11.1(e). Pursuant to the provisions of 326 IAC 2-8-11.1, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.



A State that Works

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brandon Miller of my staff at 317-234-5373 or 1-800-451-6027, and ask for extension 4-5373.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/bdm

cc: File - Cass County
Cass County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**EIS Fibercoating, Inc.
616 East Main Street
Logansport, Indiana 46947**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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.

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.: F017-31585-00039	
Issued by: Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 20, 2012 Expiration Date: November 20, 2022

First Minor Permit Revision No.: F017-32525-00039, issued on January 4, 2013.

Second Minor Permit Revision No.: F017-33765-00039	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 27, 2013 Expiration Date: November 20, 2022

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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 rubber, plastic parts and sheet goods coating and flocking operation. No rubber extrusion occurs at this operation.

Source Address:	616 East Main Street, Logansport, Indiana 46947
General Source Phone Number:	574-722-5192
SIC Code:	3069 (Fabricated Rubber Products) and 3089 (Plastic Products)
County Location:	Cass
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) flock adhesive application line with primer usage, identified as L1, constructed in 1984, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack L1.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1984, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (b) One (1) flock adhesive application line with primer usage, identified as EL1, constructed in 1988, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack EL1.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1988, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (c) One (1) flock adhesive application line with primer usage, identified as EL2, constructed in 1996, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack EL2.

This flock adhesive application line is also equipped with a flocking operation,

constructed in 1996, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (d) One (1) flock adhesive application line with primer usage, identified as 3B2, constructed in 1988, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack 3B2.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1988, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (e) One (1) Band Line flock adhesive application line with primer usage, identified as BL, constructed in 1987, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack BL.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1987, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (f) Two (2) flock adhesive application lines with primer usage, identified as L2 and L3, constructed in 1987, each with a maximum flock adhesive usage of 0.86 gallons per hour, applied with spray guns using dry filters for overspray control of particulates, and venting through stacks L2 and L3, respectively.

Each flock adhesive application line is also equipped with a flocking operation, constructed in 1987, with maximum capacity of 20 pounds per hour each, which is controlled by a separate baghouse for each line that vent inside the building.

- (g) One (1) flock adhesive application line, identified as Nisco Line, constructed in 2002, with a maximum flock adhesive usage of 0.06 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco.

This flock adhesive application line is also equipped with a flocking booth, constructed in 2002, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (h) One (1) flock adhesive application line, identified as Lock Knob/4B2 Line, constructed in 1987, with a maximum flock adhesive usage of 0.25 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through a stack identified as LK.

This flock adhesive application line is also equipped with a flocking operation constructed in 1987, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (i) One (1) flock adhesive and surface coating application line, identified as Overhead Conveyor Line, constructed in 1989, with a maximum primer usage of 0.75 gallons per hour, and flock adhesive usage of 3.0 gallons per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through a stack identified as OH.

This flock adhesive application line is also equipped with a flocking booth constructed in

1989, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (j) One (1) flock adhesive application line with primer usage, identified as L4, constructed in 2007 and modified in 2012, with a maximum flock adhesive usage of 0.86 gallon per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack Line 4/5.

This flock adhesive application line is also equipped with a flocking operation, constructed in 2007, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (k) One (1) flock adhesive application line with primer usage, identified as L5, approved for construction in 2012, with a maximum flock adhesive usage of 0.86 gallon per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack Line 4/5.

This flock adhesive application line is also equipped with a flocking operation, approved for construction in 2012, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (l) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, constructed in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using screen print methods.

This screen printing graphics line is also equipped with a flocking operation, constructed in 2007, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (m) One (1) flock adhesive application line with primer usage, identified as L6, approved for construction in 2013, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack L6.

This flock adhesive application line is also equipped with a flocking operation, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) One (1) hot water boiler, identified as B1 North, with a maximum heat input of 0.15 MMBtu/hr.
 - (2) One (1) furnace, identified as B1 S Panel, with a maximum heat input of 0.15 MMBtu/hr.
 - (3) One (1) space heater, identified as B1 South, with a maximum heat input of 0.3 MMBtu/hr.

- (4) One (1) space heater, identified as B2 N File, with a maximum heat input of 0.15 MMBtu/hr.
 - (5) One (1) furnace oven, identified as B2 Graphics, with a maximum heat input of 1.0 MMBtu/hr.
 - (6) One (1) furnace, identified as B2 Graphics, with a maximum heat input of 0.4 MMBtu/hr.
 - (7) One (1) furnace, identified as B2 Nisco, with a maximum heat input of 0.125 MMBtu/hr.
 - (8) One (1) space heater, identified as B2 SW, with a maximum heat input of 0.15 MMBtu/hr.
 - (9) One (1) space heater, identified as B2 SE, with a maximum heat input of 0.175 MMBtu/hr.
 - (10) One (1) furnace, identified as B2 Flock Store Rm, with a maximum heat input of 0.066 MMBtu/hr.
 - (11) One (1) space heater, identified as Warehouse, with a maximum heat input of 0.35 MMBtu/hr.
 - (12) One (1) space heater, identified as B2 North, with a maximum heat input of 0.35 MMBtu/hr.
- (b) Electric infrared cure equipment.
- (c) Paved and unpaved roads and parking lots with public access.

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

-
- (a) This permit, F017-31585-00039, is issued for a fixed term of ten (10) 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability [326 IAC 2-8-6] [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.5 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.6 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.7 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.8 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.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (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.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

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

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

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

B.12 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F017-31585-00039 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.14 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.15 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.16 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.17 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.18 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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 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.21 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.22 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.23 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 CO₂ equivalent emissions (CO₂e) 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.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)]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

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 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 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).

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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-8-4] [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.14 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.15 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.16 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.17 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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) flock adhesive application line with primer usage, identified as L1, constructed in 1984, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack L1.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1984, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (b) One (1) flock adhesive application line with primer usage, identified as EL1, constructed in 1988, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack EL1.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1988, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (c) One (1) flock adhesive application line with primer usage, identified as EL2, constructed in 1996, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack EL2.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1996, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (d) One (1) flock adhesive application line with primer usage, identified as 3B2, constructed in 1988, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack 3B2.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1988, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (e) One (1) Band Line flock adhesive application line with primer usage, identified as BL, constructed in 1987, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack BL.

This Band Line flock adhesive application line is also equipped with a flocking operation, constructed in 1987, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (f) Two (2) flock adhesive application lines with primer usage, identified as L2 and L3, constructed in 1987, each with a maximum flock adhesive usage of 0.86 gallons per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stacks L2 and L3, respectively.

Each flock adhesive application line is also equipped with a flocking operation, constructed in 1987, with maximum capacity of 20 pounds per hour each, which is controlled by a separate baghouse for each line that vent inside the building.

- (g) One (1) flock adhesive application line, identified as Nisco Line, constructed in 2002, with a maximum flock adhesive usage of 0.06 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco.

This flock adhesive application line is also equipped with a flocking operation, constructed in 2002, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (h) One (1) flock adhesive application line, identified as Lock Knob /4B2 Line, constructed in 1987, with a maximum flock adhesive usage of 0.25 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through a stack identified as LK.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1987, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (i) One (1) flock adhesive and surface coating application line, identified as Overhead Conveyor Line, constructed in 1989, with a maximum primer usage of 0.75 gallons per hour, and flock adhesive usage of 3.0 gallons per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through a stack identified as OH.

This flock adhesive application line is also equipped with a flocking operation, constructed in 1989, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (j) One (1) flock adhesive application line with primer usage, identified as L4, constructed in 2007 and modified in 2012, with a maximum flock adhesive usage of 0.86 gallon per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack Line 4/5.

This flock adhesive application line is also equipped with a flocking operation, constructed in 2007, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (k) One (1) flock adhesive application line with primer usage, identified as L5, approved for construction in 2012, with a maximum flock adhesive usage of 0.86 gallon per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack Line 4/5.

This flock adhesive application line is also equipped with a flocking operation, approved for construction in 2012, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (l) One (1) screen printing graphics line for sheet goods flocking, identified as GL1, constructed in 2007, with a maximum throughput of 1,500 sheets and 15 gallons of glue per hour, using screen print methods.

This screen printing graphics line is also equipped with a flocking operation, constructed in 2007, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

- (m) One (1) flock adhesive application line with primer usage, identified as L6, approved for construction in 2013, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack L6.

This flock adhesive application line is also equipped with a flocking operation, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

(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 Limits and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the Permittee shall limit emissions as follows:

- (a) The total VOC input to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total single HAP input to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total input of any combination of HAPs to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) Emissions of PM10 from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6 shall each be limited to less than 0.551 pounds per hour.
- (e) Emissions of PM2.5 from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6 shall each be limited to less than 0.551 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit PM10, PM2.5, and VOC to less than 100 tons per 12 consecutive month period, each, any single HAP to less than 10 tons per 12 consecutive month period, and total HAPs to less than 25 tons

per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

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

In order to render 326 IAC 2-2 Prevention of Significant Deterioration not applicable, the Permittee shall limit emissions as follows:

Emissions of PM from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6 shall each be limited to less than 0.551 pounds per hour.

D.1.3 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the adhesive application/surface coating processes at the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Lock Knob/4B2 Line, Overhead Conveyor Line, and L6 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the flocking operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6 shall each be limited to less than 0.551 pounds per hour when operating at a process weight rate less than one hundred (100) pounds per hour.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (a) The VOC input, including coatings, dilution solvents and cleaning solvents at the Overhead Conveyor Line, shall be limited to less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC input, including coatings, dilution solvents and cleaning solvents at the graphics line GL1 shall be limited to less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits make the requirements of 326 IAC 8-1-6 (Best Available Control Technology) not applicable.

D.1.5 VOC Emissions [326 IAC 2-8-11.1]

- (a) Pursuant to Minor Permit Revision No. 017-18432-00039, issued on April 24, 2004, the total VOC input, including coatings, dilution solvents and cleaning solvents, to the Nisco Line, Lock Knob/4B2 Line, and Overhead Conveyor Line (including primer and adhesive application) shall be limited to less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable to this modification.

- (b) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, the total VOC input, including coatings, dilution solvents and cleaning solvents to the graphics line GL1 shall be limited to less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision), 326 IAC 8-1-6 (BACT), and 326 IAC 2-2 (PSD) not applicable to this modification.

- (c) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, and as revised in the FESOP Renewal, the PM and PM10 emissions from the flocking operations on the graphics line GL1 shall each be limited to less than 0.551 pounds per hour and the particulate emissions shall be controlled with a baghouse having an overall particulate control efficiency of at least 99% and complying with a no visible emission (0% opacity) standard.

Compliance with this limit makes the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable to this modification.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Particulate Control

- (a) In order to comply with the requirements of Conditions D.1.1(d) and (e), D.1.2, D.1.3(b) and D.1.5(c), the baghouses that control particulate emissions from the flocking operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6 shall be in operation at all times that these facilities are in operation.
- (b) In order to comply with Conditions D.1.1(d) and (e), D.1.2, D.1.3(a) and D.1.5(c), filters for particulate control shall be in operation at all times that the associated flock adhesive application line is in operation.

D.1.8 Volatile Organic Compounds and Hazardous Air Pollutants [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1 (a) to (c), D.1.4, and D.1.5 (a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks L1, EL1, EL2, 3B2, BL, L2, L3, Line 4/5, Nisco, LK, OH, and L6 while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or

Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Baghouse Inspections

An inspection shall be performed semi-annually on the baghouses associated with the flocking operations at all times these units are in operation.

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

D.1.11 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1(d) and (e), D.1.2, D.1.3 and D.1.5(c), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage and emission limits established in Conditions D.1.1, D.1.4, and D.1.5. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month;
 - (4) The total single HAP usage for each month;
 - (5) The total combination HAPs usage for each month; and
 - (6) The weight of VOCs, single HAP, and a combination of HAPs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) To document the compliance status with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10.
- (d) Section C - General Record Keeping Requirements, of this permit 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 (a),(b) and (c), D.1.4, D.1.5 (a) and (b) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) One (1) hot water boiler, with a maximum heat input of 0.15 MMBtu/hr.

(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.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating), the particulate emissions from the 0.15 MMBtu per hour boiler shall be limited to less than 0.6 pounds per MMBtu.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039

**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: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039
Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6
Parameter: VOC, including coatings, dilution solvents and cleaning solvents
Limit: Less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(a)]

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: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039
Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6
Parameter: Single HAP, including single HAP in coatings, dilution solvents and cleaning solvents
Limit: Less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(b)]

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: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039
Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6
Parameter: Combination HAPs, including HAPs coatings, dilution solvents and cleaning solvents
Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(c)]

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: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039
Facility: Overhead Conveyor Line
Parameter: Total VOC usage, including coatings, dilution solvents and cleaning solvents
Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.4(a)]

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: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039
Facility: GL1
Parameter: Total VOC usage, including coatings, dilution solvents and cleaning solvents
Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.4(b)] [Condition D.1.5(b)]

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: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039
Facility: Nisco Line, Lock Knob/4B2 Line and Overhead Conveyor Line
Parameter: Total VOC usage, including coatings, dilution solvents and cleaning solvents
Limit: Less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [D.1.5(a)]

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: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
FESOP Permit No.: F017-31585-00039

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Technical Support Document (TSD) for a Minor Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name: EIS Fibercoating, Inc.
Source Location: 616 East Main Street, Logansport, Indiana 46947
County: Cass
SIC Code: 3069 (Fabricated Rubber Products) and
 3089 (Plastic Products)
Operation Permit No.: F 017-31585-00039
Operation Permit Issuance Date: November 20, 2012
Minor Permit Revision No.: 017-33765-00039
Permit Reviewer: Brandon Miller

On October 9, 2013, the Office of Air Quality (OAQ) received an application from EIS Fibercoating, Inc. related to a modification to an existing stationary rubber, plastic parts and sheet goods coating and flocking operation. No rubber extrusion occurs at this operation.

Existing Approvals

The source was issued FESOP Second Renewal No. 017-31585-00039 on November 20, 2012. The source has since received the following approvals:

- (a) Minor Permit Revision No. 017-32525-00039, issued on January 4, 2013.

County Attainment Status

The source is located in Cass County.

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

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
 Unclassifiable or attainment effective April 5, 2005, for PM2.5.

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Cass County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Cass 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.

Status of the Existing Source

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

This PTE table is from the TSD of 017-32525-00039, issued on January 4, 2013.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	HAPs
Flock adhesive application line/primer usage (L1)	2.14	2.14	2.14	0.00	0.00	Less than 99	0.00	0.00	Single Less than 9.9 Combination less than 24.9
L1 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00	
Flock adhesive application line/primer usage (EL1)	0.54	0.54	0.54	0.00	0.00		0.00	0.00	
EL1 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00	
Flock adhesive application line/primer usage (EL2)	0.54	0.54	0.54	0.00	0.00		0.00	0.00	
EL2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00	
Flock adhesive application line/primer usage (3B2)	2.93	2.93	2.93	0.00	0.00		0.00	0.00	
3B2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00	
Band Line Flock adhesive application line/primer usage (BL)	0.54	0.54	0.54	0.00	0.00		0.00	0.00	
BL Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00	
Flock adhesive application lines w/primer usage (L2 and L3)	1.37	1.37	1.37	0.00	0.00		0.00	0.00	
L2 and L3 Flocking (2.41 tons/yr each)	4.82	4.82	4.82	0.00	0.00		0.00	0.00	
Flock adhesive application line (Nisco Line)	0.08	0.08	0.08	0.00	0.00		0.00	0.00	
Nisco Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00	
Flock adhesive application line (Lock Knob/4B2 Line)	0.33	0.33	0.33	0.00	0.00		0.00	0.00	

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	HAPs	
Lock Knob/4B2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive and surface coating application (Overhead Conveyor Line)	7.61	7.61	7.61	0.00	0.00		0.00	0.00		
Overhead Conveyor Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line with primer usage (L4)	0.69	0.69	0.69	0.00	0.00		0.00	0.00		
L4 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line with primer usage (L5)	0.69	0.69	0.69	0.00	0.00		0.00	0.00		
L5 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Screen printing graphics lines for sheet goods flocking (GL1 and GL2)	0.00	0.00	0.00	0.00	0.00		0.00	0.00		
GL1 and GL2 Flocking (2.41 tons/yr each)	4.82	4.82	4.82	0.00	0.00		0.00	0.00		
Natural Gas Combustion units	0.03	0.11	0.11	0.01	1.47	0.08	1.24	1,779.94	0.03	0.03
Total PTE of Entire Source	51.22	51.31	51.31	0.01	1.47	Less than 100	1.24	1,779.94	Less than 25	Less than 10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	Less than 25	Less than 10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	Less than 25	Less than 10

negl. = negligible

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

**PM_{2.5} listed is direct PM_{2.5}.

Notes: The PM emissions from the flock adhesive application lines and graphics lines represents allowable emissions under 326 IAC 6-3-2.

PM10 emissions from the flock adhesive application lines and graphics lines represents allowable emissions under 326 IAC 2-2.

The total VOC input to the Nisco Line, Lock Knob/4B2 Line and Overhead Conveyor Line (including primer and adhesive application) shall be limited to less than 25.0 tons per year.

The total VOC input to the graphics lines GL1 and GL2 shall be limited to less than 24.9 tons.

The PM and PM10 emissions from the flocking operations on each of the graphics lines GL1 and GL2 represents allowable emissions under 326 IAC 6-3-2.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by EIS Fibercoating, Inc. on October 9, 2013. Additional information was received on November 24, 2013 which changed the scope of the project to the following:

1. To remove an existing screen printing graphics line.

One (1) screen printing graphics line for sheet goods flocking, identified as GL2, and constructed in 2007 is being removed from the facility.
2. To construct and operate one new flock adhesive lines.

The source applied to add a new flock adhesive application line, Line 6 (L6). The coating and potential coating usage for the new flocking line will be identical to the existing L1 flocking adhesive line.
3. To amend the description of the stack for Lines 4 and 5 to be Line 4/5 stack since they share a common stack.

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

- (m) One (1) flock adhesive application line with primer usage, identified as L6, approved for construction in 2013, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack L6.

This flock adhesive application line is also equipped with a flocking operation, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Flock adhesive application line/primer usage L6	8.06	8.06	8.06	0	0	14.14	0	0	13.20	8.73 Xylene
L6 Flocking Operation	16.43	16.43	16.43	0	0	0	0	0	0	0
Total PTE of Proposed Revision	24.48	24.48	24.48	0	0	14.14	0	0	13.20	8.73 Xylene

Pursuant to 326 IAC 2-8-11.1(d), this FESOP is being revised through a FESOP Minor Permit Revision because the proposed revision involves the construction of new emission units with potential to emit (PTE) within the following ranges:

- (A) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either PM, PM₁₀, or direct PM_{2.5}.
- (B) Less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of sulfur dioxide (SO₂).
- (C) Less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of nitrogen oxides (NO_x).
- (D) Less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of VOC for modifications that are not described in clause (E).
- (E) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of VOC for modifications that require the use of air pollution control equipment to comply with the applicable provisions of 326 IAC 8.
- (F) Less than one hundred (100) tons per year and equal to or greater than twenty-five (25) tons per year of carbon monoxide (CO).
- (G) Less than five (5) tons per year and equal to or greater than two-tenths (0.2) ton per year of lead (Pb).
- (H) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of the following regulated air pollutants:
 - (i) Hydrogen sulfide (H₂S).
 - (ii) Total reduced sulfur (TRS).
 - (iii) Reduced sulfur compounds.
 - (iv) Fluorides.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	HAPs	
Flock adhesive application line/primer usage (L1)	1.61 2.44	1.61 2.44	1.61 2.44	0.00	0.00	Less than 99	0.00	0.00	Single Less than 9.9 Combination less than 24.9	
L1 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line/primer usage (EL1)	0.54	0.54	0.54	0.00	0.00		0.00	0.00		
EL1 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line/primer usage (EL2)	0.54	0.54	0.54	0.00	0.00		0.00	0.00		
EL2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line/primer usage (3B2)	2.93	2.93	2.93	0.00	0.00		0.00	0.00		
3B2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Band Line Flock adhesive application line/primer usage (BL)	0.54	0.54	0.54	0.00	0.00		0.00	0.00		
BL Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application lines w/primer usage (L2 and L3)	1.37	1.37	1.37	0.00	0.00		0.00	0.00		
L2 and L3 Flocking (2.41 tons/yr each)	4.82	4.82	4.82	0.00	0.00		0.00	0.00		
Flock adhesive application line (Nisco Line)	0.08	0.08	0.08	0.00	0.00		0.00	0.00		
Nisco Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line (Lock Knob/4B2 Line)	0.33	0.33	0.33	0.00	0.00		0.00	0.00		
Lock Knob/4B2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive and surface coating application (Overhead Conveyor Line)	7.61	7.61	7.61	0.00	0.00		0.00	0.00		
Overhead Conveyor Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line with primer usage (L4)	0.69	0.69	0.69	0.00	0.00		0.00	0.00		
L4 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line with primer usage (L5)	0.69	0.69	0.69	0.00	0.00	0.00	0.00			
L5 Flocking	2.41	2.41	2.41	0.00	0.00	0.00	0.00			
Screen printing graphics lines for sheet goods flocking (GL1 and GL2)	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
GL1 Flocking operation and GL2 Flocking (2.41 tons/yr each)	2.41 4.82	2.41 4.82	2.41 4.82	0.00	0.00	0.00	0.00			
Flock adhesive application line/primer usage L6	1.61	1.61	1.61	0.00	0.00	0.00	0.00			
L6 Flocking Operation	2.41	2.41	2.41	0.00	0.00	0.00	0.00			
Natural Gas Combustion units	0.03	0.11	0.11	0.01	1.47	0.08	1.24	1,779.94	0.03	0.03
Total PTE of Entire Source	51.78 51.22	51.87 51.31	51.87 51.31	0.01	1.47	Less than 100	1.24	1,779.94	Less than 25	Less than 10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	Less than 25	Less than 10

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	HAPs	
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	Less than 25	Less than 10
<p>negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), not particulate matter (PM), is considered as a "regulated air pollutant". **PM_{2.5} listed is direct PM_{2.5}. Notes: The PM emissions from the flock adhesive application lines and graphics lines represents allowable emissions under 326 IAC 6-3-2. PM₁₀ emissions from the flock adhesive application lines and graphics lines represents allowable emissions under 326 IAC 2-2. The total VOC input to the Nisco Line, Lock Knob/4B2 Line and Overhead Conveyor Line (including primer and adhesive application) shall be limited to less than 25.0 tons per year. The total VOC input to the graphics lines GL1 and GL2 shall be limited to less than 24.9 tons. The PM and PM₁₀ emissions from the flocking operations on each of the graphics lines GL1 and GL2 represents allowable emissions under 326 IAC 6-3-2.</p>										

Note: The calculations for Flocking Line 1 were updated at the request of the Permittee to more accurately reflect the adhesive and primer application process.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, 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 Prior to Revision (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	HAPs	
Flock adhesive application line/primer usage (L1)	1.61	1.61	1.61	0.00	0.00	Less than 99	0.00	0.00	Single Less than 9.9	
L1 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line/primer usage (EL1)	0.54	0.54	0.54	0.00	0.00		0.00	0.00		
EL1 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line/primer usage (EL2)	0.54	0.54	0.54	0.00	0.00		0.00	0.00		
EL2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line/primer usage (3B2)	2.93	2.93	2.93	0.00	0.00		0.00	0.00		
3B2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Band Line Flock adhesive application line/primer usage (BL)	0.54	0.54	0.54	0.00	0.00		0.00	0.00		
BL Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application lines w/primer usage (L2 and L3)	1.37	1.37	1.37	0.00	0.00		0.00	0.00		
L2 and L3 Flocking (2.41 tons/yr each)	4.82	4.82	4.82	0.00	0.00		0.00	0.00		
Flock adhesive application line (Nisco Line)	0.08	0.08	0.08	0.00	0.00		0.00	0.00		
Nisco Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line (Lock Knob/4B2 Line)	0.33	0.33	0.33	0.00	0.00		0.00	0.00		
Lock Knob/4B2 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
										Combination less than 24.9

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	HAPs	
Flock adhesive and surface coating application (Overhead Conveyor Line)	7.61	7.61	7.61	0.00	0.00		0.00	0.00		
Overhead Conveyor Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line with primer usage (L4)	0.69	0.69	0.69	0.00	0.00		0.00	0.00		
L4 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line with primer usage (L5)	0.69	0.69	0.69	0.00	0.00		0.00	0.00		
L5 Flocking	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Screen printing graphics lines for sheet goods flocking (GL1)	0.00	0.00	0.00	0.00	0.00		0.00	0.00		
GL1 Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Flock adhesive application line/primer usage L6	1.61	1.61	1.61	0.00	0.00		0.00	0.00		
L6 Flocking Operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00		
Natural Gas Combustion units	0.03	0.11	0.11	0.01	1.47	0.08	1.24	1,779.94	0.03	0.03
Total PTE of Entire Source	51.78	51.87	51.87	0.01	1.47	Less than 100	1.24	1,779.94	Less than 25	Less than 10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	Less than 25	Less than 10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	Less than 25	Less than 10

*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".

**PM_{2.5} listed is direct PM_{2.5}.

Notes: The PM emissions from the flock adhesive application lines and graphics lines represents allowable emissions under 326 IAC 6-3-2.
 PM10 emissions from the flock adhesive application lines and graphics lines represents allowable emissions under 326 IAC 2-2.
 The total VOC input to the Nisco Line, Lock Knob/4B2 Line and Overhead Conveyor Line (including primer and adhesive application) shall be limited to less than 25.0 tons per year.
 The total VOC input to the graphics line GL1 shall be limited to less than 24.9 tons.
 The PM and PM10 emissions from the flocking operation on graphics line GL1 represents allowable emissions under 326 IAC 6-3-2.

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (a) The total VOC input to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the VOC emissions from the other emission units at this source, source-wide VOC emissions are limited to less than one hundred (100) tons per year.

Note: This is an existing limit but has been revised. The reference to screen printing graphics line GL2 has been removed and the new flocking line, L6, has been added into the limit. This is a Title I change.

- (b) The total single HAP input to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Note: This is an existing limit but has been revised. The reference to screen printing graphics line GL2 has been removed and the new flocking line, L6, has been added into the limit. This is a Title I change.

- (c) The total input of any combination of HAPs to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Note: This is an existing limit but has been revised. The reference to screen printing graphics line GL2 has been removed and the new flocking line, L6, has been added into the limit. This is a Title I change.

- (d) Emissions of PM10 from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6 shall each be limited to less than 0.551 pounds per hour.

Note: This is an existing limit but has been revised. The reference to screen printing graphics line GL2 has been removed and the new flocking line, L6, has been added into the limit. This is a Title I change.

- (e) Emissions of PM2.5 from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6 shall each be limited to less than 0.551 pounds per hour.

Note: This is an existing limit but has been revised. The reference to screen printing graphics line GL2 has been removed and the new flocking line, L6, has been added into the limit. This is a Title I change.

Compliance with these limits, combined with the potential to emit PM₁₀, PM_{2.5}, VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀, PM_{2.5}, and VOC to less than 100 tons per 12 consecutive month period, each, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

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

In order to not be subject to the requirements of 326 IAC 2-2 (PSD), the source shall comply with the following:

- (a) Emissions of PM from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and L6 shall each be limited to less than 0.551 pounds per hour.

Note: This is an existing limit but has been revised. The reference to screen printing graphics line GL2 has been removed and the new flocking line, L6, has been added into the limit. This is a Title I change.

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (c) 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 proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the

provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit 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.
- (d) 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.
- (e) 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 (40%) 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.
- (f) 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.
- (g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating)
This source applies adhesive and primers to rubber and plastic automotive parts only. The source does not apply coatings to metal parts. Even though the source applies coatings to plastic parts, it is located in Cass County. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

Flock Adhesive Application Line 6 with Primer Usage

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) Pursuant to 326 IAC 6-3-2(d), particulate emissions from the adhesive application/surface coating processes at the facility, identified as L6, shall be controlled by a dry particulate

filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (2) The flocking operations associated with the facility identified as L6 has a process weight rate less than one hundred (100) pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the flocking operations associated with the facility identified as L6 shall be limited to less than 0.551 pounds per hour when operating at a process weight rate of less than one hundred (100) pounds per hour.

The baghouses that control particulate emissions from this operation shall be in operation at all times the flocking operation is in operation, in order to comply with this limit.

- (k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 The unlimited VOC potential emissions from the flock adhesive applications line identified as L6 is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (l) 326 IAC 8-2-2 (Automobile and Light-Duty Truck Coating Operations)
 Pursuant to 326 IAC 8-2-2, L6 is exempt from the requirements of 326 IAC 8-2-2, because the source does not coat passenger car or passenger car derivatives capable of seating twelve (12) or fewer passengers and any motor vehicle rated at 3,864 kilograms (eight thousand five hundred (8,500 pounds) gross weight or less which are designed primarily for the purpose of transportation or are derivatives of such vehicles. This source only consists of surface coating of plastic interior automotive parts, which do not meet the definition of automobiles or light duty trucks as defined in 326 IAC 8-2-2(a).
- (m) 326 IAC 8-22 (Miscellaneous Industrial Adhesives)
 Pursuant to 326 IAC 8-22-1, this source is not subject to the requirements of 326 IAC 8-22 since it is not located in Lake County or Porter County.
- (n) There are no other 326 IAC 8 Rules that are applicable to L6.

Compliance Determination, Monitoring and Testing Requirements
--

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

Emission Unit/Control	Operating Parameters	Frequency
L6 Stacks ¹	Integrity and Particle Loading Inspections	Once per day
	Overspray observations	Once per week
	Stack Inspections	Once per month
L6 flocking operation baghouses ²	Inspection	Semi-Annual

- (1) These monitoring conditions are necessary because the dry filters for the flock adhesive application and surface coating booths must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).
- (2) These monitoring conditions are necessary because the baghouses that control particulate emissions from the flocking operations associated with the facility identified as L6 shall be in operation at all times that the facility is in operation and must operate properly to ensure compliance with 326 IAC 2-8-4 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

The baghouses for control of particulate from the flocking operation exhaust inside the building. IDEM does not require visible emissions notations for particulate sources that exhaust indoors and whose vents cannot be redirected outdoors, but the baghouse needs semi-annual inspections because the control was used for potential to emit for the calculations.

- (b) There are no testing requirements for the facilities at this source and none are being added as a result of this revision. The Permittee is required to keep records of the amount of VOC and HAP used in the flock adhesive application lines.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

1. One (1) screen printing graphics line for sheet goods flocking, identified as GL2, and constructed in 2007 is being removed from the facility.
2. The source applied to add a new flock adhesive application line, Line 6 (L6). The coating and potential coating usage for the new flocking line will be identical to the existing L1 flocking adhesive line.
3. Lines 4 and 5 share a common stack. The stack identifier is being changed to Line 4/5 for both of these flock adhesive application lines.

...

- (j) One (1) flock adhesive application line with primer usage, identified as L4, constructed in 2007 and modified in 2012, with a maximum flock adhesive usage of 0.86 gallon per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack ~~Line 4/5~~**L4**.

...

- (k) One (1) flock adhesive application line with primer usage, identified as L5, approved for construction in 2012, with a maximum flock adhesive usage of 0.86 gallon per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack ~~Line 4/5~~**L5**.

...

- ~~(m) One (1) screen printing graphics line for sheet goods flocking, identified as GL2, constructed in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using screen print methods for adhesive application, venting through stack GL2.~~

~~This screen printing graphics line is also equipped with a flocking operation, constructed in 2007, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.~~

- (m) **One (1) flock adhesive application line with primer usage, identified as L6, approved for construction in 2013, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack L6.**

This flock adhesive application line is also equipped with a flocking operation, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.

...

...

(j)	One (1) flock adhesive application line with primer usage, identified as L4, constructed in 2007 and modified in 2012, with a maximum flock adhesive usage of 0.86 gallon per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack Line 4/5 L4.
...	
(k)	One (1) flock adhesive application line with primer usage, identified as L5, approved for construction in 2012, with a maximum flock adhesive usage of 0.86 gallon per hour, applied with spray guns and using dry filters for overspray control of particulates, and venting through stack Line 4/5 L5.
...	
(m)	One (1) flock adhesive application line with primer usage, identified as L6, approved for construction in 2013, with a maximum primer usage of 0.20 gallons per hour and a maximum flock adhesive usage of 0.40 gallons per hour, using either drip and wipe or spray guns application method, using dry filters for overspray control of particulates, and venting through stack L6. This flock adhesive application line is also equipped with a flocking operation, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.
(m)	One (1) screen printing graphics line for sheet goods flocking, identified as GL2, constructed in 2007, with a maximum throughput of 400 sheets and 4 gallons of glue per hour, using screen print methods for adhesive application, venting through stack GL2. This screen printing graphics line is also equipped with a flocking operation, constructed in 2007, with maximum capacity of 20 pounds per hour, which is controlled by a baghouse that vents inside the building.
<p>(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)</p>	

...
D.1.1 FESOP Limits and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the Permittee shall limit emissions as follows:

- (a) The total VOC input to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total single HAP input to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total input of any combination of HAPs to the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~L6, including coatings, dilution solvents and cleaning solvents, shall be limited to less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (d) Emissions of PM10 from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~ **L6** shall each be limited to less than 0.551 pounds per hour.
- (e) Emissions of PM2.5 from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~ **L6** shall each be limited to less than 0.551 pounds per hour.

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

Emissions of PM from each of the flocking operations on the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~ **L6** shall each be limited to less than 0.551 pounds per hour.

D.1.3 Particulate [326 IAC 6-3-2]

- (a) **Pursuant to 326 IAC 6-3-2(d), particulate from the adhesive application/surface coating processes at the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Lock Knob/4B2 Line, Overhead Conveyor Line, and L6 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the flocking operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and **L6** shall each be limited to less than 0.551 pounds per hour when operating at a process weight rate less than one hundred (100) pounds per hour.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (c) ~~The VOC input, including coatings, dilution solvents and cleaning solvents at the graphics line GL2 shall be limited to less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits make the requirements of 326 IAC 8-1-6 (Best Available Control Technology) not applicable.~~

D.1.5 VOC Emissions [326 IAC 2-8-11.1]

- (b) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, the total VOC input, including coatings, dilution solvents and cleaning solvents to the graphics lines GL1 and ~~GL2~~ shall be limited to less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Pursuant to Minor Permit Revision No. 017-24687-00039, issued on August 17, 2007, and as revised in ~~this~~ **the** FESOP Renewal, the PM and PM10 emissions from the flocking operations on ~~each~~ of the graphics lines GL1 and ~~GL2~~ shall each be limited to less than 0.551 pounds per hour and the particulate emissions shall be controlled with a baghouse having an overall particulate control efficiency of at least 99% and complying with a no visible emission (0% opacity) standard.

...
D.1.7 Particulate Control

- (a) In order to comply with the requirements of Conditions D.1.1(d) and (e), D.1.2, D.1.3**(b)** and D.1.5(c), the baghouses that control particulate emissions from the flocking

operations associated with the facilities identified as L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~L6 shall be in operation at all times that these facilities are in operation.

- (b) In order to comply with Conditions D.1.1(d) and (e), D.1.2, D.1.3(a) and D.1.5(c), filters for particulate control shall be in operation at all times that the associated flock adhesive application line is in operation.

...
D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks L1, EL1, EL2, 3B2, BL, L2, L3, ~~Line 4/5~~L4, L5, Nisco, LK, OH, and L6 while one or more of the booths are in operation. If a condition exists which should result in a response ~~step~~, 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. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, 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. Failure to take response steps shall be considered a deviation from this permit.

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

FESOP Quarterly Report

...
Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~L6
Parameter: VOC, including coatings, dilution solvents and cleaning solvents
Limit: Less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(a)]

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

FESOP Quarterly Report

...
Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2~~L6
Parameter: Single HAP, including single HAP in coatings, dilution solvents and cleaning solvents
Limit: Less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(b)]

...

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

FESOP Quarterly Report

...
 Facility: L1, EL1, EL2, 3B2, BL, L2, L3, L4, L5, Nisco Line, Lock Knob/4B2 Line, Overhead Conveyor Line, GL1, and ~~GL2L6~~
 Parameter: Combination HAPs, including HAPs coatings, dilution solvents and cleaning solvents
 Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.1(c)]

...

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

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
 Source Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP Permit No.: F017-31585-00039
 Facility: GL1
 Parameter: Total VOC usage, including coatings, dilution solvents and cleaning solvents
 Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.4(eb)] **[Condition D.1.5(b)]**

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

~~FESOP Quarterly Report~~

~~Source Name: EIS Fibercoating, Inc.
 Source Address: 616 East Main Street, Logansport, Indiana 46947
 FESOP Permit No.: F017-31585-00039
 Facility: GL2
 Parameter: Total VOC usage, including coatings, dilution solvents and cleaning solvents
 Limit: Less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.4(d)]~~

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: _____ EIS Fibercoating, Inc. _____
 Source Address: _____ 616 East Main Street, Logansport, Indiana 46947 _____
 FESOP Permit No.: _____ F017-31585-00039 _____
 Facility: _____ GL1 _____
 Parameter: _____ Total VOC usage, including coatings, dilution solvents and cleaning solvents _____
 Limit: _____ Less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. [Condition D.1.5(b)] _____
 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: _____

...

Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

1. IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
2. IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
3. IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.
4. IDEM is removing the affidavit from the permit as it is unnecessary for this revision.

...

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

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

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.**

...
C.16 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.

...

Mail to: Permit Administration and Support Section

Office of Air Quality
400 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

EIS Fibercoating, Inc. _____
616 East Main Street
Logansport, Indiana 46947 _____

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 EIS Fibercoating, Inc., 616 East Main Street, Logansport, Indiana 46947, completed the modification of Line 4 and the construction of Line 5 on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on _____

November 26, 2012, and as permitted pursuant to FESOP Operating Permit No. 017-31585-00039 issued on

November 20, 2012.

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)

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 October 9, 2013. Additional information was received from the applicant on November 24, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Minor Permit Revision No. 017-33765-00039. The staff recommends to the Commissioner that this FESOP Minor Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brandon Miller 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) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (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: Emission Calculations
Summary

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

Uncontrolled and Unlimited Potential to Emit

Emission Unit(s)	Potential To Emit (tons/yr)										
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Single HAPs	Worst Single HAP
Flock adhesive application line/primer usage (L1)	8.06	8.06	8.06	0.00	0.00	14.14	0.00	0.00	13.20	8.73	xylylene
L1 Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application line/primer usage (EL1)	2.71	2.71	2.71	0.00	0.00	14.14	0.00	0.00	13.20	8.73	xylylene
EL1 Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application line/primer usage (EL2)	2.71	2.71	2.71	0.00	0.00	14.14	0.00	0.00	13.20	8.73	xylylene
EL2 Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application line/primer usage (3B2)	12.04	12.04	12.04	0.00	0.00	17.88	0.00	0.00	13.20	8.73	xylylene
3B2 Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Band Line Flock adhesive application line/primer usage (BL)	2.71	2.71	2.71	0.00	0.00	14.14	0.00	0.00	13.20	8.73	xylylene
(BL) Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application lines w/primer usage (L2 and L3)	6.86	6.86	6.86	0.00	0.00	17.02	0.00	0.00	11.60	1.96	xylylene
L2 and L3 Flocking operation	33.18	33.18	33.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application line (Nisco Line)	0.39	0.39	0.39	0.00	0.00	3.01	0.00	0.00	1.21	0.56	xylylene
Nisco Line Flocking Operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application line (Lock Knob/4B2 Line)	1.64	1.64	1.64	0.00	0.00	6.34	0.00	0.00	5.05	2.35	xylylene
Lock Knob/4B2 Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive and surface coating application (Overhead Conveyor Line)	38.04	38.04	38.04	0.00	0.00	5.36	0.00	0.00	0.00	0.00	xylylene
Overhead Conveyor Line Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application line with primer usage (L4)	3.43	3.43	3.43	0.00	0.00	8.51	0.00	0.00	5.80	4.82	toluene
L4 Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application line with primer usage (L5)	3.43	3.43	3.43	0.00	0.00	8.51	0.00	0.00	5.80	4.82	toluene
L5 Flocking operation	16.59	16.59	16.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Screen printing graphics lines for sheet goods flocking (GL1)	0.00	0.00	0.00	0.00	0.00	324.80	0.00	0.00	0.00	0.00	
GL1 Flocking Operation	42.71	42.71	42.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock adhesive application line/primer usage L6	8.06	8.06	8.06	0.00	0.00	14.14	0.00	0.00	13.20	8.73	xylylene
L6 Flocking Operation	16.43	16.43	16.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Combustion units	0.03	0.11	0.11	0.01	1.47	0.08	1.24	1,779.94	0.03	0.03	hexane
Totals	348.32	348.41	348.41	0.01	1.47	462.23	1.24	1,779.94	108.70	#REF!	xylylene

**Appendix A: Emission Calculations
Summary**

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

Controlled and Limited Potential to Emit												
Emission Unit(s)	Potential To Emit (tons/yr)					VOC	CO	GHGs as CO ₂ e	Total HAPs	Single HAP	Worst Single HAP	
	PM	PM10	PM2.5	SO ₂	NO _x							
Flock adhesive application line/primer usage (L1)	1.61	1.61	1.61	0.00	0.00	Less than 99	0.00	0.00	Less than 24.9	Less than 9.9	xylylene	
L1 Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Flock adhesive application line/primer usage (EL1)	0.54	0.54	0.54	0.00	0.00		0.00	0.00				xylylene
EL 1 Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Flock adhesive application line/primer usage (EL2)	0.54	0.54	0.54	0.00	0.00		0.00	0.00				xylylene
EL 2 Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Flock adhesive application line/primer usage (3B2)	2.41	2.41	2.41	0.00	0.00		0.00	0.00				xylylene
3B2 Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Band Line Flock adhesive application line/primer usage (BL)	0.54	0.54	0.54	0.00	0.00		0.00	0.00				xylylene
BL Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Flock adhesive application lines without primer usage (L2 and L3)	1.37	1.37	1.37	0.00	0.00		0.00	0.00				xylylene
L2 and L3 Flocking operation	4.82	4.82	4.82	0.00	0.00		0.00	0.00				
Flock adhesive application line (Nisco Line)	0.08	0.08	0.08	0.00	0.00		0.00	0.00				xylylene
Nisco Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Flock adhesive application line (Lock Knob/4B2 Line)	0.33	0.33	0.33	0.00	0.00		0.00	0.00				xylylene
Lock Knob/4B2 Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Flock adhesive and surface coating application (Overhead Conveyor Line)	7.61	7.61	7.61	0.00	0.00		0.00	0.00				xylylene
Overhead Conveyor Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Flock adhesive application line with primer usage (L4)	0.69	0.69	0.69	0.00	0.00		0.00	0.00				xylylene
L4 Flocking operation	2.41	2.41	2.41	0.00	0.00		0.00	0.00				
Flock adhesive application line with primer usage (L5)	0.69	0.69	0.69	0.00	0.00	0.00	0.00					
L5 Flocking operation	2.41	2.41	2.41	0.00	0.00	0.00	0.00					
Screen printing graphics lines for sheet goods flocking (GL1)	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
GL 1 Flocking operation	2.41	2.41	2.41	0.00	0.00	0.00	0.00					
Flock adhesive application line/primer usage L6	1.61	1.61	1.61	0.00	0.00	0.00	0.00		xylylene			
L6 Flocking Operation	2.41	2.41	2.41	0.00	0.00	0.00	0.00					
Natural Gas Combustion units	0.03	0.11	0.11	0.01	1.47	0.08	1.24	1,779.94	0.03	0.03	hexane	
Totals	51.78	51.87	51.87	0.01	1.47	Less than 100	1.24	1,779.94	Less than 25	Less than 10		

**Appendix A: Emission Calculations
VOC and Particulate Emissions from L1, EL1, EL2, 3B2, and BL**

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

1. VOC and PM/PM10 emissions from the coating operations (worst case scenario):

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr/line)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls		
											PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
UNIT: L1															
Primer Eastman	7.28	96.4%	0.0%	96.4%	0.20	7.02	1.40	33.69	6.15	65%	1.83E-02	0.08	80%	3.67E-03	1.61E-02
Flocklok 852 Adhesive	8.29	48.3%	0.0%	48.3%	0.40	4.00	1.60	38.44	7.02	65%	0.60	2.63	80%	0.12	0.53
S1213 Blend (gun purge)	7.46	100%	0.0%	100%	0.03	7.46	0.22	5.37	0.98	65%	0.00	0.00	80%	0.00	0.00
Nyatex 1127 (gun purge is water)	8.67	70.0%	0.0%	10.30%	2.00	0.89	1.79	42.86	7.82	65%	1.82	7.97	80%	0.36	1.59
Total L1									14.14			8.06			1.61
UNIT: EL1															
Primer Eastman	7.28	96.4%	0.0%	96.4%	0.20	7.02	1.40	33.69	6.15	65%	1.83E-02	0.08	80%	3.67E-03	1.61E-02
Flocklok 852 Adhesive	8.29	48.3%	0.0%	48.3%	0.40	4.00	1.60	38.44	7.02	65%	0.60	2.63	80%	0.12	0.53
S1213 Blend (gun purge)	7.46	100%	0.0%	100%	0.03	7.46	0.22	5.37	0.98	65%	0.00	0.00	80%	0.00	0.00
Total EL1									14.14			2.71			0.54
UNIT: EL2															
Primer Eastman	7.28	96.4%	0.0%	96.4%	0.20	7.02	1.40	33.69	6.15	65%	1.83E-02	0.08	80%	3.67E-03	1.61E-02
Flocklok 852 Adhesive	8.29	48.3%	0.0%	48.3%	0.40	4.00	1.60	38.44	7.02	65%	0.60	2.63	80%	0.12	0.53
S1213 Blend (gun purge)	7.46	100%	0.0%	100%	0.03	7.46	0.22	5.37	0.98	65%	0.00	0.00	80%	0.00	0.00
Total EL2									14.14			2.71			0.54
UNIT: 3B2															
Primer Eastman	7.28	96.4%	0.0%	96.4%	0.20	7.02	1.40	33.69	6.15	65%	1.83E-02	0.08	80%	3.67E-03	1.61E-02
Flocklok 852 Adhesive	8.29	48.3%	0.0%	48.3%	0.40	4.00	1.60	38.44	7.02	65%	0.60	2.63	80%	0.12	0.53
S1213 Blend (gun purge)	7.46	100%	0.0%	100%	0.03	7.46	0.22	5.37	0.98	65%	0.00	0.00	80%	0.00	0.00
Nyatex 1127 (gun purge is water)	8.67	70.0%	0.0%	10.30%	3.00	0.89	2.68	64.30	11.73	65%	2.73	11.96	80%	0.55	2.39
Total 3B2									17.88			12.04			2.41
UNIT: BL															
Primer Eastman	7.28	96.4%	0.0%	96.4%	0.20	7.02	1.40	33.69	6.15	65%	1.83E-02	0.08	80%	3.67E-03	1.61E-02
Flocklok 852 Adhesive	8.29	48.3%	0.0%	48.3%	0.40	4.00	1.60	38.44	7.02	65%	0.60	2.63	80%	0.12	0.53
S1213 Blend (gun purge)	7.46	100%	0.0%	100%	0.03	7.46	0.22	5.37	0.98	65%	0.00	0.00	80%	0.00	0.00
Total BL									14.14			0.62			0.54
Total Emissions from all 5 units							20.61		74.45		7.64	28.22		1.53	5.64

Assume all the PM emissions are PM10 and PM2.5 emissions.

Note: New materials being used in L1 and 3B2 and gun purge is water. The maximum hourly usage (gal/hour) changed in units L1,EL1,EL2 and BL and primer material changed.

Unit 3B2 uses Nyatex but it cannot be added to the other coatings on the line as all coatings would not be sprayed together in the same hour, so the Nyatex is not added, the other coatings have the highest PTE.

Nyatex is an example of a coating that would be used at a much higher rate but with lower emissions, usage for that line had increased but the pte did not increase.

The S1213 Blend is the gun cleaner that is used with only Flockloc 852. Water is used as a gun cleaner for the Nyatex.

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency)

PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)

PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

2. PM/PM10 emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for each line	3.79	16.6	0.038	0.17
Total for 5 lines		83.0		0.83

Allowable Emissions (each line):	0.551	lbs/hr
Allowable Emissions (each line):	2.41	tons/yr

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency

PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)

PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions from L1, EL1, EL2, 3B2, and BL**

**Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller**

1. HAPs emissions from the coating operations (worst case scenario):

Material	Density (Lb/Gal)	Maximum Usage (gal/hr/line)	Weight % 4,4-Methylenediphenyl Diisocyanate	PTE of 4,4-Methylenediphenyl Diisocyanate (tons/yr)	Weight % Ethyl Benzene	PTE of Ethyl Benzene (tons/yr)	Weight % Methyl Isobutyl Ketone	PTE of Methyl Isobutyl Ketone (tons/yr)	Weight % Xylene	PTE of Xylene (tons/yr)	Weight % Glycol Ethers	PTE of Glycol Ethers	Weight % Dibutyl Phthalate	PTE of Dibutyl Phthalate	Total HAPs Each Line
UNIT: L1															
Primer Eastman	7.28	0.20	0.00%	0.00	20.00%	1.28	0.00%	0.00	80.00%	5.10	0.00%	0.00	0.00%	0.00	6.38
Flocklok 852 Adhesive	8.29	0.40	2.00%	0.29	10.00%	1.45	10.00%	1.45	25.00%	3.63	0.00%	0.00	0.00%	0.00	6.83
S1213 Blend (gun purge)	7.46	0.03	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Nyatex 1127	8.67	2.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	2.00%	1.52	2.00%	1.52	2.00%	1.52	4.56
Total L1				0.29		2.73		1.45		8.73		1.52		1.52	13.20
Unit: EL1															
Primer Eastman	7.28	0.20	0.00%	0.00	20.00%	1.28	0.00%	0.00	80.00%	5.10	0.00%	0.00	0.00%	0.00	6.38
Flocklok 852 Adhesive	8.29	0.40	2.00%	0.29	10.00%	1.45	10.00%	1.45	25.00%	3.63	0.00%	0.00	0.00%	0.00	6.83
S1213 Blend (gun purge)	7.46	0.03	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Total EL1				0.29		2.73		1.45		8.73		0.00		0.00	13.20
Unit: EL2															
Primer Eastman	7.28	0.20	0.00%	0.00	20.00%	1.28	0.00%	0.00	80.00%	5.10	0.00%	0.00	0.00%	0.00	6.38
Flocklok 852 Adhesive	8.29	0.40	2.00%	0.29	10.00%	1.45	10.00%	1.45	25.00%	3.63	0.00%	0.00	0.00%	0.00	6.83
S1213 Blend (gun purge)	7.46	0.03	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Total EL2				0.29		2.73		1.45		8.73		0.00		0.00	13.20
Unit: 3B2															
Primer Eastman	7.28	0.20	0.00%	0.00	20.00%	1.28	0.00%	0.00	80.00%	5.10	0.00%	0.00	0.00%	0.00	6.38
Flocklok 852 Adhesive	8.29	0.40	2.00%	0.29	10.00%	1.45	10.00%	1.45	25.00%	3.63	0.00%	0.00	0.00%	0.00	6.83
S1213 Blend (gun purge)	7.46	0.03	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Nyatex 1127	8.67	3.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	2.00%	2.28	2.00%	2.28	2.00%	2.28	6.84
Total 3B2				0.29		2.73		1.45		8.73		2.28		2.28	13.20
Unit: BL															
Primer Eastman	7.28	0.20	0.00%	0.00	20.00%	1.28	0.00%	0.00	80.00%	5.10	0.00%	0.00	0.00%	0.00	6.38
Flocklok 852 Adhesive	8.29	0.40	2.00%	0.29	10.00%	1.45	10.00%	1.45	25.00%	3.63	0.00%	0.00	0.00%	0.00	6.83
S1213 Blend (gun purge)	7.46	0.03	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Total BL				0.29		2.73		1.45		8.73		0.00		0.00	13.20
Total for 5 lines				1.45		13.64		7.26		43.66		3.80		3.80	
														Total HAPs	
														73.61 tons/yr	

METHODOLOGY

PTE of HAPs (tons/yr) = Density (lb/gal) x Max. Usage (gal/hr/line) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and Particulate Emissions from L2 and L3**

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

1. VOC and PM/PM10 emissions from the coating operations (worst case scenario):

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr/line)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls		
											PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
Nyatex	8.67	70.0%	59.7%	10.3%	0.86	0.89	0.77	18.4	3.36	65%	0.78	3.43	80%	0.16	0.69
10N1086 Primer	7.35	100%	0.0%	94%	0.17	6.91	1.17	28.19	5.14	65%	0.00	0.00	80%	0.00	0.00
Total for each line							1.94				0.78	3.43		0.16	0.69
Total for 2 lines									17.0			6.86		0.31	1.37

Assume all the PM emissions are PM10 and PM2.5 emissions.

Note: Source no longer uses S1213 Blend on this line and the gun purge is water.

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1 - Transfer efficiency)

PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1 - Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)

PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

2. PM/PM10 Emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
 Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for each line	3.79	16.6	0.038	0.17
Total for 2 lines		33.2		0.33

Allowable Emissions (each line):	0.551	lbs/hr
Allowable Emissions (each line):	2.41	tons/year
	4.82	

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency

PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)

PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions from L2 and L3**

**Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller**

1. HAPs emissions from the coating operations (worst case scenario):

Material	Density (lb/gal)	Maximum Usage (gal/hour/line)	Weight % 4,4-Methylenediphenyl Diisocyanate	Weight % Ethyl Benzene	Weight % Methyl Isobutyl Ketone	Weight % Xylene	Weight % Glycol Ethers	Weight % Toluene
Nyatex 1127	8.67	0.86	0.0%	0.0%	0.0%	2.0%	0.0%	0.0%
10N1086 Primer	7.35	0.17	0.0%	0.0%	0.0%	6.0%	0.0%	88.0%

Material	same as above	Potential to Emit (tons/yr)						
		4,4-Methylenediphenyl Diisocyanate	Ethyl Benzene	Methyl Isobutyl Ketone	Xylene	Glycol Ethers	Toluene	
Nyatex 1127		0.00	0.00	0.00	0.65	0.00	0.00	
10N1086 Primer		0.00	0.00	0.00	0.33	0.00	4.82	
Total for each line		0.00	0.00	0.00	0.98	0.00	4.82	
Total for 2 lines		0.00	0.00	0.00	1.96	0.00	9.63	
							Total HAPs	11.60 tons/yr

METHODOLOGY

PTE of HAPs (tons/yr) = Density (lbs/gal) x Max. Usage (gal/hr/line) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and Particulate Emissions from Nisco, Lock Knob /4B2 Line and Overhead Conveyor

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

1. VOC and PM/PM10 emissions from the coating operations (worst case scenario):

Process Line	Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls						
												PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)				
Nisco	FL 852	8.29	48.3%	0.0%	48.3%	0.06	4.00	0.24	5.77	1.05	65%	0.09	0.39	80%	0.02	0.08				
	Cleaner	7.46	100%	0.0%	100%	0.06	7.46	0.45	10.74	1.96	65%	0.00	0.00	80%	0.00	0.00				
Total VOC (tons/yr) and PM/PM surface coating for Nisco Line										3.01			0.39			0.08				
Lock Knob/4B2	FL 852	8.29	48.3%	0.0%	48.3%	0.25	4.00	1.00	24.02	4.38	65%	0.38	1.64	80%	0.08	0.33				
	Cleaner	7.46	100%	0.0%	100%	0.06	7.46	0.45	10.74	1.96	65%	0.00	0.00	80%	0.00	0.00				
Total VOC (tons/yr) and PM/PM surface coating for Lock Knob/4B2 Line										6.34			1.64			0.33				
Overhead Conveyor	Glidden 6813	8.68	4.7%	0.0%	4.7%	3.00	0.41	1.22	29.37	5.36	65%	8.69	38.04	80%	1.74	7.61				
	Total VOC (tons/yr) and PM/PM surface coating for Overhead Conveyor Line										5.36			38.04			7.61			
Totals												3.36	80.65	14.72		9.15	42.12		1.83	8.42

Assume all the PM emissions are PM10 and PM2.5 emissions.

Note: New material being used at the Overhead Conveyor line, lower VOC content and no HAPs, but maximum usage increased.

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr) x Density (lbs/gal) x (1 - Weight % Volatile) x (1 - Transfer efficiency)

PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr) x Density (lbs/gal) x (1 - Weight % Volatile) x (1 - Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)

PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

2. PM/PM10 emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
 Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for each line	3.79	16.6	0.038	0.17
Total for 3 lines		49.8		0.50

Allowable Emissions (each line):	0.551	lbs/hr
Allowable Emissions (each line):	2.41	tons/year

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency

PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)

PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions from Nisco, Lock Knob and Overhead Conveyor

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

Process Line (Material)	Density (Lb/Gal)	Maximum Usage (gal/hr)	Weight % Ethyl Benzene	Weight % MIBK	Weight % Toluene	Weight % Xylene	Weight % MDI	Weight % Glycol Ethers	Weight % Dibutyl Phthalate
Nisco Line (FL 852)	8.29	0.06	10.00%	11.80%	6.30%	25.90%	1.60%	0.00%	0.00%
Lock Knob/4B2 Line (FL 852)	8.29	0.25	10.00%	11.80%	6.30%	25.90%	1.60%	0.00%	0.00%
Overhead Conveyor Line (Glidden 6813)	8.68	3.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

			Potential to Emit (tons/yr)							
Process Line (Material)	Density (Lb/Gal)	Maximum Usage (gal/hr)	Ethyl Benzene	MIBK	Toluene	Xylene	MDI	Glycol Ethers	Dibutyl Phthalate	Total HAPs (tons/year)
Nisco Line (FL 852)	same as above		0.22	0.26	0.14	0.56	0.03	0.00	0.00	1.21
Lock Knob/4B2 Line (FL 852)			0.91	1.07	0.57	2.35	0.15	0.00	0.00	5.05
Overhead Conveyor Line (Glidden 6813)			0.00	0.00	0.0	0.00	0.00	0.00	0.00	0.00
Totals			1.13	1.33	0.7	2.92	0.18	0.00	0.00	6.26

METHODOLOGY

PTE of HAPS (tons/yr) = Density (lb/gal) x Max. Usage (gal/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

Note: New material used on the Overhead Conveyor line that is used at a higher usage rate, but with no primer, lower VOC content and no HAPs.

**Appendix A: Emission Calculations
VOC and Particulate Emissions from Line 4**

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

1. VOC and PM/PM10 emissions from the coating operations (worst case scenario):

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr/line)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls		
											PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
Nyatex	8.67	70.0%	59.7%	10.3%	0.86	0.89	0.77	18.43	3.36	65%	0.78	3.43	80%	0.16	0.69
10N1086 Primer	7.35	100%	0.0%	94%	0.17	6.91	1.17	28.19	5.14	65%	0.00	0.00	80%	0.00	0.00
Total for line 4							1.94		8.51		0.78	3.43		0.16	0.69

Assume all the PM emissions are PM10 and PM2.5 emissions.

Note: Source no longer uses S1213 Blend on this line and the gun purge is water.

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1 - Transfer efficiency)

PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1 - Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)

PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

2. PM/PM10 Emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
 Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for each line	3.79	16.6	0.038	0.17

Allowable Emissions (each line):	0.551 lbs/hr
Allowable Emissions (each line):	2.41 tons/year

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency

PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)

PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions from L4**

**Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller**

1. HAPs emissions from the coating operations (worst case scenario):

Material	Density (lb/gal)	Maximum Usage (gal/hour/line)	Weight % 4,4-Methylenediphenyl Diisocyanate	Weight % Ethyl Benzene	Weight % Methyl Isobutyl Ketone	Weight % Xylene	Weight % Glycol Ethers	Weight % Toluene
Nyatex 1127	8.67	0.86	0.0%	0.0%	0.0%	2.0%	0.0%	0.0%
10N1086 Primer	7.35	0.17	0.0%	0.0%	0.0%	6.0%	0.0%	88.0%

Material	same as above	Potential to Emit (tons/yr)						Total HAPs (ton/year)
		4,4-Methylenediphenyl Diisocyanate	Ethyl Benzene	Methyl Isobutyl Ketone	Xylene	Glycol Ethers	Toluene	
Nyatex 1127		0.00	0.00	0.00	0.65	0.00	0.00	
10N1086 Primer		0.00	0.00	0.00	0.33	0.00	4.82	
Total for line 4		0.00	0.00	0.00	0.98	0.00	4.82	5.80

METHODOLOGY

PTE of HAPs (tons/yr) = Density (lbs/gal) x Max. Usage (gal/hr/line) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and Particulate Emissions from Line 5**

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

1. VOC and PM/PM10 emissions from the coating operations (worst case scenario):

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr/line)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Transfer Efficiency	Before Controls		After Controls		
											PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
Nyatex	8.67	70.0%	59.7%	10.3%	0.86	0.89	0.77	18.43	3.36	65%	0.78	3.43	80%	0.16	0.69
10N1086 Primer	7.35	100%	0.0%	94%	0.17	6.91	1.17	28.19	5.14	65%	0.00	0.00	80%	0.00	0.00
Total for line 5							1.94		8.51		0.78	3.43		0.16	0.69

Assume all the PM emissions are PM10 and PM2.5 emissions.

Note: Source no longer uses S1213 Blend on this line and the gun purge is water.

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency)

PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)

PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

2. PM/PM10 Emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
 Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for each line	3.79	16.6	0.038	0.17

Allowable Emissions (each line):	0.551 lbs/hr
Allowable Emissions (each line):	2.41 tons/year

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency

PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)

PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions from L5**

**Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller**

1. HAPs emissions from the coating operations (worst case scenario):

Material	Density (lb/gal)	Maximum Usage (gal/hour/line)	Weight % 4,4-Methylenediphenyl Diisocyanate	Weight % Ethyl Benzene	Weight % Methyl Isobutyl Ketone	Weight % Xylene	Weight % Glycol Ethers	Weight % Toluene
Nyatex 1127	8.67	0.86	0.0%	0.0%	0.0%	2.0%	0.0%	0.0%
10N1086 Primer	7.35	0.17	0.0%	0.0%	0.0%	6.0%	0.0%	88.0%

Material	same as above	Potential to Emit (tons/yr)						Total HAPs (ton/year)
		4,4-Methylenediphenyl Diisocyanate	Ethyl Benzene	Methyl Isobutyl Ketone	Xylene	Glycol Ethers	Toluene	
Nyatex 1127		0.00	0.00	0.00	0.65	0.00	0.00	
10N1086 Primer		0.00	0.00	0.00	0.33	0.00	4.82	
Total for line 5		0.00	0.00	0.00	0.98	0.00	4.82	5.80

METHODOLOGY

PTE of HAPs (tons/yr) = Density (lbs/gal) x Max. Usage (gal/hr/line) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and Particulate Emissions from GL1**

Company Name: EIS Fibercoating, Inc.
Address: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

1. VOC Emissions

Emission Unit (ID)	Material	Density (lb/gal)	Weight % VOC	Weight % Water	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating	PTE VOC (lb/day)	PTE VOC (ton/yr)
Graphics Line 1 (GL1) Option 1	Nazdar 6254OKI	7.03	68.6%	0%	15.0	4.82	1,736	317
	KIWO (cleanup solvent)	7.56	100%	0%	0.13	7.56	23.6	4.30
	Mineral Spirits	6.42	100%	0%	0.13	6.42	20.0	3.66
Graphics Line 1 (GL1) Option 2	Wliflex 10280FB (10265FB)	10.1	0.99%	0%	15.0	0.10	36.0	6.57
	KIWO (cleanup solvent)	7.56	100%	0%	0.13	7.56	23.6	4.30
	Mineral Spirits	6.42	100%	0%	0.13	6.42	20.0	3.66
Worst Case Totals							1,780	325

The source will only use one option for Graphics Line 1 (Option 1 or 2) at a time. Worst case totals represent worst case emissions for VOC from Option 1 or 2 for Graphics Line 1.

The coatings used do not contain any HAPs.

The coatings are applied with direct contact methods (screen printing and roll coating) with 100% transfer efficiency. No particulate is formed in the process.

METHODOLOGY

Pounds of VOC per gallon of coating (lb/gal) = Density (lb/gal) x Weight % VOC

PTE VOC (lbs/day) = Pounds of VOC per gallon of coating (lb/gal) x Maximum Hourly Usage (gal/hr) x 24 hrs/day

PTE VOC (tons/yr) = Pounds of VOC per gallon of coating (lb/gal) x Maximum Hourly Usage (gal/hr) x 8760 hrs/yr x 1 ton/2000 lbs

2. PM/PM10 Emissions from the flocking operations:

Emission Unit (ID)	Maximum Usage (lbs/hr)	Transfer Efficiency (%)	Uncontrolled PTE of PM/PM10
Graphics Line 1 (GL1)	15	35%	42.7
Total			42.7

Control Efficiency (%)	Controlled PTE of PM/PM10
99%	0.43
	0.43

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.		
Allowable Emissions:	0.551	lbs/hour
Allowable Emissions :	2.41	tons/year

Assume transfer efficiency of 35 % for average work. Particulate is controlled with a baghouse having a control efficiency of 99%. Assume all the PM emissions are PM10 and PM2.5 emissions.

METHODOLOGY

Uncontrolled PTE of PM/PM10 (tons/yr) = Maximum Usage (lbs/hr) x (1 - Transfer Efficiency (%)) x 8,760 hrs/yr x 1 ton/2,000 lbs

Controlled PTE of PM/PM10 (tons/yr) = Uncontrolled PTE of PM/PM10 (tons/yr) x (1 - Control Efficiency (%))

**Appendix A: Emissions Calculations
PM, VOC and HAP Emissions**

Line 6

Company Name: EIS Fibercoating, Inc.
Address City IN Zip: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

VOC and PM Emissions from Coating Operation

Emission Unit (ID)	Material	Density (lb/gal)	Weight % Volatile	Weight % Water	Weight % VOC	Maximum Hourly Usage (gal/hr)	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (ton/yr)	Transfer Efficiency	Uncontrolled		Controlled		
											PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Particulate Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)
L6*	Primer Eastman	7.3	96.4%	0.0%	96.4%	0.20	7.02	1.40	6.15	65%	0.02	0.08	80%	0.00	0.02
	Flocklok 852 Adhesive	8.29	48.3%	0.0%	48.3%	0.40	4.00	1.60	7.02	65%	0.60	2.63	80%	0.12	0.53
	S1213 Blend (gun purge for 852)	7.46	100.0%	0.0%	100.0%	0.03	7.46	0.22	0.98	65%	0.00	0.00	80%	0.00	0.00
	Nyatex 1127 (gun purge is water)	8.67	70.0%	59.7%	10.3%	2.00	0.89	1.79	7.82	65%	1.82	7.97	80%	0.36	1.59
Total for Line 6										14.14		8.06			1.61

HAP Emissions

Emission Unit ID	Material	Density (lb/gal)	Maximum Usage (gal/hr)	Weight % MDI	Weight % Ethylbenzene	Weight % MIBK	Weight % Xylene	Weight % Glycol Ethers	Weight % Dibutyl Phthalate	MDI (TPY)	Ethylbenzene (TPY)	MIBK (TPY)	Xylene (TPY)	Glycol Ethers (TPY)	Dibutyl Phthalate (TPY)	PTE Total HAP (TPY)
L6*	Primer Eastman	7.3	0.20	0.00%	20.00%	0.00%	80.00%	0.00%	0.00%	0.00	1.28	0.00	5.10	0.00	0.00	6.38
	Flocklok 852 Adhesive	8.29	0.40	2.00%	10.00%	10.00%	25.00%	0.00%	0.00%	0.29	1.45	1.45	3.63	0.00	0.00	6.83
	S1213 Blend (gun purge)	7.46	0.03	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Nyatex 1127 (gun purge is water)	8.67	2.00	0.00%	0.00%	0.00%	2.00%	2.00%	2.00%	0.00	0.00	0.00	1.52	1.52	1.52	4.56
Total for Line 6										0.29	2.73	1.45	8.73	1.52	1.52	13.20

Assume all the PM emissions are PM10 and PM2.5 emissions.

Note: L6 applies both primer (Primer Eastman) and adhesive (Flocklok 852 Adhesive or S1213 Blend). The Flocklok combined with the gun purge (S1213 Blend) is the worse case adhesive for the VOC emissions and the Nyatex 1127 is the worse case adhesive for particulate emission. Both materials are shown in the above tables however only the worse case material is used for the emission totals.

Nyatex is an example of a coating that would be used at a much higher rate but with lower emissions, usage for that line had increased but the pte did not increase.

The S1213 Blend is the gun cleaner that is used with only Flockloc 852. Water is used as a gun cleaner for the Nyatex.

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 24 hrs/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) x Max. Usage (gal/hr/line) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency)

PTE of PM/PM10 Before Control (tons/yr) = Max. Usage (gal/hr/line) x Density (lbs/gal) x (1 - Weight % Volatile) x (1-Transfer efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency)

PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

PM/PM10 Emissions from the flocking operations:

PM/PM10 Collected: 3.75 lbs/hr of flock
Baghouse Control Efficiency: 99%

Allowable Emissions: Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from manufacturing processes with process weight rates less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

	PTE Before Controls		PTE After Controls	
	lbs/hr	tons/yr	lbs/hr	tons/yr
PM/PM10 for L6	3.75	16.4	0.038	0.16

Allowable Emissions:	0.551	lbs/hour
Allowable Emissions:	2.41	tons/year

METHODOLOGY

PTE of PM/PM10 Before Controls (lbs/hr) = PM/PM10 Collected (lbs/hr) / Control Efficiency

PTE of PM/PM10 Before Controls (tons/yr) = PM/PM10 Collected (lbs/hr) / Control Efficiency x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Controls (lbs/hr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency)

PTE of PM/PM10 After Controls (tons/yr) = PTE of PM/PM10 Before Controls (lbs/hr) x (1 - Control Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emissions Calculations

**Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: EIS Fibercoating, Inc.
Address City IN Zip: 616 East Main Street, Logansport, Indiana 46947
FESOP MPR: 017-33765-00039
Reviewer: Brandon Miller

Unit	ID#	MMBtu/hr
hot water boiler	B1 North	0.15
furnace	B1 S Panel	0.15
space heater	B1 South	0.3
space heater	B2N File	0.15
furnace oven	B2 Graphics	1.00
furnace	B2 Graphics	0.40
furnace	B2 Nisco	0.125
space heater	B2 SW	0.15
space heater	B2 SE	0.175
furnace	B2 Flock Store Rm	0.066
space heater	Warehouse	0.35
space heater	B2 North	0.35
Total		3.366

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.366	1000	29.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.11	0.11	0.01	1.47	0.08	1.24

*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/1,000 MMBtu

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.096E-05	1.769E-05	1.106E-03	2.654E-02	5.013E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.372E-06	1.622E-05	2.064E-05	5.602E-06	3.096E-05
Total					2.782E-02

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,769	0.0	0.0
Summed Potential Emissions in tons/yr	1,769		
CO2e Total in tons/yr	1,780		

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Megan Schultz
EIS Fibercoating, Inc.
616 E Main Street
Logansport, IN 46947

DATE: November 27, 2013

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

SUBJECT: Final Decision
Minor Permit Revision
017-33765-00039

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:
Stephanie Madden – EHS Technology Group, LLC
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 11/27/2013 EIS Fibercoating, Inc 017-33765-00039 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Megan Schultz EIS Fibercoating, Inc 616 E Main St Logansport IN 46947 (Source CAATS) via confirmed delivery										
2		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)										
3		Cass County Board of Commissioner 200 Court Park Logansport IN 46947 (Local Official)										
4		Cass County Health Department 512 High Street Logansport IN 46947-2766 (Health Department)										
5		Logansport City Council and Mayors Office 601 Broadway Logansport IN 46947 (Local Official)										
6		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 (Affected Party)										
7		Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 (Affected Party)										
8		Stephanie Madden EHS Technology Group, LLC PO Box 187 Miamisburg OH 45343 (Consultant)										
9												
10												
11												
12												
13												
14												
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