INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: November 26, 2013

RE: 3M Hartford City / 009-33795-00004

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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Russell Edmonds
3M Hartford City
304S 075 E,
Hartford City, Indiana 47348

November 26, 2013

Re: 009-33795-00004
Administrative Amendment to
Part 70 Operating Permit T 009-32463-00004

Dear Mr. Edmonds:

3M Hartford City was issued a Part 70 Operating Permit No. T 009-32463-00004 on September 5, 2013 for a stationary tape, label and extruded web manufacturing plant located at 304S 075 E, Hartford City, Indiana. On October 21, 2013, the Office of Air Quality (OAQ) received an application from the source requesting the following be added.

The existing three die cleaner units, identified as EUXXX, EUXXX, and EUXXX, each constructed in 1995 and used to solvent clean the coating die from EU 001, EU002 and EU003 constructed in 1995, has the potential to emit VOC of 4.41 tons per year, an exempt unit under 326 IAC 2-1.1-3. Since these units do meet the definition of a "Cold Cleaner Degreaser", therefore they will be updated to include in the existing applicable state requirements.

Pursuant to 326 IAC 2-7-11(a)(8)(A), this change to the permit is considered an administrative amendment because the permit is amended to incorporate an exempt unit as described in 326 IAC 2-1.1-3 that does not otherwise constitute a modification for purposes of 326 IAC 2-7-10.5 (Source Modifications) or 326 IAC 2-7-12 (Permit Modifications).

	PTE of Proposed Existing Units (tons/year)									
Process/ Emission Unit	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
3 die units	0.00	0.00	0.00	0.00	0.00	4.41	0.00	0.00	0.00	0.00
Total PTE of Proposed Modification	0.00	0.00	0.00	0.00	0.00	4.41	0.00	0.00	0.00	0.00

See Appendix A for the potential to emit of the exempted emissions unit(s).

(a) The addition of the exempted emission units is considered a PSD minor modification to an existing PSD major source.

(b) No new state rules are applicable to this source due to the addition of the emission unit.

(c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this administrative amendment.

Proposed Changes:

Pursuant to 326 IAC 2-7-11(a), the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**:

Change 1: Updating existing emission units to satisfy the already existing state applicable requirements.

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

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

(a) One (1) BA Coating Line, identified as EU001, constructed in 1963, consisting of the following equipment:

two (2) coating stations (coating stations 1 and 2), installed in 1963, and one (1) coating station (coating station 3), installed in 1995, each applying coatings with methods including, but not limited to, gravure, reverse roll, extrusion die, hopper/knife, and/or slot die, utilizing thermal oxidizer No. 2, identified as C002, **maximum capacity at 16 MMBtu** for volatile organic compound (VOC) control, and six (6) natural gas-fired drying ovens (total heat capacity 5.5 mmBTU/hr) exhausting to stack S/V 888-002.

...

(b) One (1) BC-1 Coating Line, identified as EU002, constructed in 1963 and modified in 1986, consisting of the following equipment:

one (1) coating station, installed in 1963, and one (1) coating station installed in 1986, each applying coatings with methods including, but not limited to, pressure fed die, gravure, curtain and/or fluid bed, utilizing thermal oxidizer No. 3, identified as C003, **maximum capacity at 16 MMBtu** for volatile organic compound (VOC) control, and three (3) natural gas-fired drying ovens (total heat capacity 17.42 mmBTU/hr) exhausting to stack S/V 888-009.

...

(k) Die Cleaning Stations:

Three die cleaning stations identified as EUXXX, EUXXX, and EUXXX, each constructed in 1995 and used to solvent clean the coating die from EU 001, EU002 and EU003.

SECTION D.6 FACILITY OPERATION CONDITIONS - Degreasing

Facility Description [326 IAC 2-7-5(15)]: ~~Insignificant Activities~~ **Degreasing Operations**

(a) **Insignificant Activities:**

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

(b) Die Cleaning Stations:

Three die cleaning stations identified as EUXXX, EUXXX, and EUXXX, each constructed in 1995 and used to solvent clean the coating die from EU 001, EU002 and EU003.

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

...

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

Change 2: Corrections made to Appendix A calculations

PTE of the Entire Source After Issuance of the MSOP

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

Emission Units	Potential to emit After Issuance (Tons/yr)									
	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Single HAP	Total HAP	CO2e
BA Coating Line	0.00	0.00	0.00	0.00	0.00	1006.00	0.00	16.43	70.68	0
BC-1 Coating Line	0.00	0.00	0.00	0.00	0.00	112.00	0.00			0
BC-2 Coating Line	0.00	0.00	0.00	0.00	0.00	485.00	0.00			0
VCS Coating Line	0.00	0.00	0.00	0.00	0.00	40.00	0.00			0
Extrusion Line	0.00	0.00	0.00	0.00	0.00	40.00	0.00	0.00	0.00	0
Compounding	0.00	0.00	0.00	0.00	0.00	6.17	0.00	6.17	6.17	0
Storage Tanks	0.00	0.00	0.00	0.00	0.00	1.93	0.00	0.85	0.85	0
Boilers 1, 2, 3	2.36	2.71	1.83	~~92.59~~ **92.49**	~~28.31~~ **28.28**	0.89	13.58	0.29	0.31	~~25,459~~ **25,431**
Emergency Generator- NG	~~0.2~~ **0.01**	~~0.80~~ **0.02**	~~0.80~~ **0.02**	~~0.06~~ **0.00**	~~10.47~~ **1.43**	~~0.58~~ **0.04**	~~8.79~~ **1.30**	0.02	~~0.20~~ **0.03**	~~12,635~~ **41**
Emergency Generator - Diesel	~~0.28~~ **0.04**	~~0.16~~ **0.04**	~~0.16~~ **0.04**	~~0.16~~ **0.03**	~~9.60~~ **0.52**	~~0.28~~ **0.04**	~~2.2~~ **0.11**	- 0.00	- 0.00	~~466~~ **19**
Thermal Oxidizers	~~0.37~~ **0.26**	~~1.47~~ **1.04**	~~1.47~~ **1.04**	~~0.12~~ **0.08**	~~19.32~~ **13.74**	~~1.06~~ **0.76**	~~16.23~~ **11.54**	0.25	~~0.44~~ **0.26**	~~28,000~~ **16,590**
Insignificant Activity (Combustion Unit)	~~0.44~~ **0.26**	~~1.76~~ **1.05**	~~1.76~~ **1.05**	~~0.14~~ **0.08**	~~23.19~~ **13.83**	~~1.28~~ **0.76**	~~19.48~~ **11.62**	- 0.25	~~0.36~~ **0.26**	~~23,329~~ **16,694**
die cleaning units	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.41**	**0.00**	**0.00**	**0.00**	**0.00**
FirePump	**0.14**	**0.14**	**0.14**	**0.13**	**1.98**	**0.16**	**0.43**	**0.00**	**0.00**	**73.01**
Total PTE of Entire Source	~~3.65~~ **3.07**	~~6.90~~ **5.00**	~~6.02~~ **4.12**	~~93.07~~ **92.82**	~~90.89~~ **59.77**	~~1695.2~~ **1698**	~~60.3~~ **38.58**	**>10**	**78.56**	~~89,890~~ **58,849**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25	100,000 CO_2e
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA	100,000 CO_2e

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 Administrative Amendment permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission Units	Potential to emit After Issuance (Tons/yr)									
	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Single HAP	Total HAP	CO2e
BA Coating Line	0.00	0.00	0.00	0.00	0.00	1006.00	0.00	16.43	70.68	0
BC-1 Coating Line	0.00	0.00	0.00	0.00	0.00	112.00	0.00			0
BC-2 Coating Line	0.00	0.00	0.00	0.00	0.00	485.00	0.00			0
VCS Coating Line	0.00	0.00	0.00	0.00	0.00	40.00	0.00			0
Extrusion Line	0.00	0.00	0.00	0.00	0.00	40.00	0.00	0.00	0.00	0
Compounding	0.00	0.00	0.00	0.00	0.00	6.17	0.00	6.17	6.17	0
Storage Tanks	0.00	0.00	0.00	0.00	0.00	1.93	0.00	0.85	0.85	0
Boilers 1, 2, 3	2.36	2.71	1.83	92.49	28.28	0.89	13.58	0.29	0.31	25,431
Emergency Generator- NG	0.01	0.02	0.02	0.00	1.43	0.04	1.30	0.02	0.03	41
Emergency Generator - Diesel	0.04	0.04	0.04	0.03	0.52	0.04	0.11	0.00	0.00	19
Thermal Oxidizers	0.26	1.04	1.04	0.08	13.74	0.76	11.54	0.25	0.26	16,590
Insignificant Activity (Combustion Unit)	0.26	1.05	1.05	0.08	13.83	0.76	11.62	0.25	0.26	16,694
die cleaning units	0.00	0.00	0.00	0.00	0.00	4.41	0.00	0.00	0.00	0.00
FirePump	0.14	0.14	0.14	0.13	1.98	0.16	0.43	0.00	0.00	73.01
Total PTE of Entire Source	3.07	5.00	4.12	92.82	59.77	1698	38.58	>10	78.56	58,849
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25	100,000 CO_2e
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA	100,000 CO_2e

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit as modified.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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 Anh Nguyen of my staff, at 317-233-5334 or 1-800-451-6027, and ask for extension 3-5334.

Sincerely,

Tripuran Sinha

Tripuran P. Sinha, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit and Appendix A

TS/AN

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

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Commissioner

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

3M Hartford City
304S 075E
Hartford City, Indiana 47348

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

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

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

Operation Permit No.: T009-32463-00004	
Issued by:	Issuance Date: September 5, 2013
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: September 5, 2018

AA No.: T009-33795-00004	
Issued by:	Issuance Date: November 26, 2013
Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date: September 5, 2018

TABLE OF CONTENTS

A. SOURCE SUMMARY
- A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B. GENERAL CONDITIONS
- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
- B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
- B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]
- B.11 Emergency Provisions [326 IAC 2-7-16]
- B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
- B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
- B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
- B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
- B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
- B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]
- B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
- B.20 Source Modification Requirement [326 IAC 2-7-10.5]
- B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
- B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
- B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]
- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-7-6(1)]
- C.9 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]
C.10 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]
C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]
C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

Stratospheric Ozone Protection
C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS - One Coating Line (EU001)

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Prevention of Significant Deterioration (PSD) Requirements [326 IAC 2-2]
D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]
D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]

Compliance Determination Requirements
D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]
D.1.6 Thermal Oxidizer Temperature
D.1.7 Parametric Monitoring

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.8 Record Keeping Requirements
D.1.9 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS - Two Coating Lines (EU002 & EU003)

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 PSD BACT for Volatile Organic Compounds [326 IAC 2-2][326 IAC 2-2-3][326 IAC 8-1-6]
D.2.2 PSD Minor Limit for Volatile Organic Compounds (VOC) [326 IAC 2-2]
D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]

Compliance Determination Requirements
D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]
D.2.6 Thermal Oxidizer Temperature
D.2.7 Parametric Monitoring

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.2.8 Record Keeping Requirements
D.2.9 Reporting Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS - One Coating Line (EU004)

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]
D.3.2 PSD Minor Limit for Volatile Organic Compounds (VOC) [326 IAC 2-2]
D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]

Compliance Determination Requirements
D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
D.3.5 Testing Requirements [326 IAC 2-7-6 (1) (6)] [326 IAC 2-1.1-11]
D.3.6 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]
D.3.7 Thermal Oxidizer Temperature
D.3.8 Parametric Monitoring

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.3.9 Record Keeping Requirements
D.3.10 Reporting Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS - One Extrusion Line (EU005)

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.4.2 PSD Minor Limit for Volatile Organic Compounds (VOC) [326 IAC 2-2]
D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
D.4.6 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]
D.4.7 Thermal Oxidizer Temperature
D.4.8 Parametric Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.4.9 Record Keeping Requirements
D.4.10 Reporting Requirements

SECTION D.5 FACILITY OPERATION CONDITIONS - Three Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.5.1 Sulfur Dioxide (SO2) [326 IAC 7-1.1-1] [326 IAC 2-2]
D.5.2 Particulate [326 IAC 6-2-4]
D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.5.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.5.5 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.5.6 Record Keeping Requirements
D.5.7 Reporting Requirements

SECTION D.6 FACILITY OPERATION CONDITIONS - Degreasing

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
D.6.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.6.3 Record Keeping Requirements

SECTION E.1 FACILITY OPERATION CONDITIONS

E.1.1 General Provisions Relating to NESHAP Subpart JJJJ [40 CFR Part 63, Subpart A]
E.1.2 Paper and other Web Coating NESHAP [40 CFR Part 63, Subpart JJJJ]

SECTION E.2 FACILITY OPERATION CONDITIONS
E.2.1 General Provisions Relating to NSPS Subpart RR [40 CFR Part 60, Subpart A]
E.2.2 Standards of Performance for Pressure Sensitive Tape and Label Materials Coating Operation NSPS [40 CFR Part 60, Subpart RR]

SECTION E.3 FACILITY OPERATION CONDITIONS
E.3.1 General Provisions Relating to NESHAP Subpart DDDDD [40 CFR 63, Subpart A]
E.3.2 Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP [40 CFR Part 63, Subpart DDDDD]

SECTION E.4 FACILITY OPERATION CONDITIONS

E.4.1 General Provisions Relating to NESHAP Subpart ZZZZ [40 CFR 63, Subpart A]
E.4.2 Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

Certification
Emergency Occurrence Report
Semi-Annual Natural Gas Fired Boiler Certification
Part 70 Quarterly Reports
Quarterly Deviation and Compliance Monitoring Report

Attachment A - NESHAP for Paper and Web Coating Operations [40 CFR 63, Subpart JJJJ]
Attachment B - NSPS for Pressure Sensitive Tape and Label Materials Coating Operations [40 CFR 60, Subpart RR]
Attachment C - NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, [40 CFR 63, Subpart DDDDD]
Attachment D - NESHAP for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary tape, label and extruded web manufacturing plant.

Source Address:	304S 075E, Hartford City, Indiana 47348
General Source Phone Number:	(765) 348-3200
SIC Code:	2672, 2899, 3081
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) BA Coating Line, identified as EU001, constructed in 1963, consisting of the following equipment:

two (2) coating stations (coating stations 1 and 2), installed in 1963, and one (1) coating station (coating station 3), installed in 1995, each applying coatings with methods including, but not limited to, gravure, reverse roll, extrusion die, hopper/knife, and/or slot die, utilizing thermal oxidizer No. 2, identified as C002, maximum capacity at 16 MMBtu for volatile organic compound (VOC) control, and six (6) natural gas-fired drying ovens (total heat capacity 5.5 mmBTU/hr) exhausting to stack S/V 888-002.

Under 40 CFR 63.3280, Subpart JJJJ, this facility is considered an existing major source of HAP at which web coating lines are operated.

(b) One (1) BC-1 Coating Line, identified as EU002, constructed in 1963 and modified in 1986, consisting of the following equipment:

one (1) coating station, installed in 1963, and one (1) coating station installed in 1986, each applying coatings with methods including, but not limited to, pressure fed die, gravure, curtain and/or fluid bed, utilizing thermal oxidizer No. 3, identified as C003, maximum capacity at 16 MMBtu for volatile organic compound (VOC) control, and three (3) natural gas-fired drying ovens (total heat capacity 17.42 mmBTU/hr) exhausting to stack S/V 888-009.

Under 40 CFR 63.3280, Subpart JJJJ, this facility is considered an existing major source of HAP at which web coating lines are operated.

(c) One (1) BC-2 Coating Line, identified as EU003, consisting of the following equipment:

one (1) coating station, installed in 1963, applying coatings with methods including, but not limited to, wrap cast, reverse roll, gravure, and/or reverse gravure, utilizing thermal oxidizer No. 3, identified as C003, for volatile organic compound (VOC) control, and three (3) natural gas-fired drying ovens (total heat capacity 4.17 mmBTU/hr) exhausting to stack S/V 888-009. This Coating Line was changed as per a permit issued on July 10, 1998;

Under 40 CFR 63.3280, Subpart JJJJ, this facility is considered an existing major source of HAP at which web coating lines are operated.

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994, consisting of the following equipment:

(1) One (1) compounding room, constructed in 1994, exhausting to stack S/V 001-001;

(2) One (1) coating station, installed in 1994, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing thermal oxidizer No. 2, C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;

(3) One (1) coating station, approved for construction in 2007, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing an enclosure and a thermal oxidizer No. 2, C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002; and

(4) Four (4) natural gas-fired drying ovens, two (2) constructed in 1994 with a rated capacity of 0.80 MMBtu/hr each, two (2) constructed in 2007, with a rated capacity of 0.55 MMBTU/hr and 0.88 MMBtu/hr.

Under 40 CFR 60, Subpart RR, this facility is considered an existing pressure sensitive tape and label materials coating line and under 40 CFR 63.3280, Subpart JJJJ, this facility is considered an existing major source of HAP at which web coating lines are operated.

(e) One (1) Extrusion Line, identified as EU005, constructed in 1996, consisting of one (1) extruder, calendar rolls, and one (1) oven, utilizing thermal oxidizer No. 2, C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;

Under 40 CFR 63.3280, Subpart JJJJ, this facility is considered an existing major source of HAP at which web coating lines are operated.

(f) One (1) compounding/mix & mill area, identified as EU007, containing variety of mixing vessels, each constructed between 1957-1995, used for mixing in the compounding area;

(g) Three (3) boilers, identified as EU008, EU009, and EU010, each constructed in 1986, each with a maximum heat input capacity of 12.553 MMBtu per hour, each combusting natural gas and No.2 Fuel Oil, exhausting to stacks S/V 001-005, 001-006, and 001-007, respectively;

Under 40 CFR 63, Subpart DDDDD, these boilers are classified as existing units designed to burn gas 1 fuels.

(h) Six (6) outdoor bulk storage tanks, identified as T001, T003, T006, T008, T009 and T012, each constructed in 1988, 1976, 1986, 1999, 1985 and 2000, respectively, each with a maximum tank capacity of 30,000, 20,000, 30,000, 275, 275 and 275 gallons, respectively, each containing volatile organic liquids with maximum true vapor pressure less than 15.0 kPa; and

(i) Five (5) indoor bulk storage tanks, identified as T002, T004, T005, T007, and T011 constructed in 1997, 1997, 1997, 1992, and 1991 respectively, with a maximum tank capacity of 300, 300, 300, 7500, and 1500 gallons, respectively, each containing volatile organic liquids with maximum true vapor pressure less than 15.0 kPa.

(j) Die Cleaning Stations:

Three die cleaning stations identified as EUXXX, EUXXX, and EUXXX, each constructed in 1995 and used to solvent clean the coating die from EU 001, EU002 and EU003.

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

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

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-5]

(b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2(e)]

(c) Trimmers that do not produce fugitive emissions that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone; [326 IAC 6-3-2(e)]

(d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4-3]

(e) Emergency Generator constructed April 1, 2008, with a maximum capacity of 195 HP, combusting natural gas. [40 CFR 63, Subpart ZZZZ]

(f) One (1) diesel-fired emergency generator, constructed in January 1993, with a maximum capacity of 67.05 HP. [40 CFE 63, Subpart ZZZZ]

(g) One (1) diesel-fired stationary fire pump, constructed in October 1974, with a maximum capacity of 225 HP.[40 CFR 63, Subpart ZZZZ]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1 (22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T 009-32463-00004, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) In addition to the non-applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determination regarding this source:

(1) BA Coating Line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR) because of the following reasons:

(i) The BA Coating Line was originally constructed in 1963 (prior to the applicability date of December 30, 1980);

(ii) The changes to the BA Coating Line do not constitute a reconstruction because the fixed cost of the new equipment does not exceed 50% of the fixed capital cost required to construct an entirely new facility; and

(iii) The changes to the BA Coating Line do not constitute a modification. The NSPS modification provisions of 40 CFR 60.14 apply when a physical or operational change occurs which could result in an increase in the hourly potential emissions, unless such change qualifies for one of the exemptions at 40 CFR 60.14(e). The emission rate before and after a physical or operational change is evaluated by comparing the hourly potential emissions under maximum capacity immediately before the change to emissions at maximum capacity after the change. Under the General Provisions of the NSPS, only physical limitations on maximum capacity are considered in determining potential emissions. 3M has provided with adequate evidence to IDEM that there was a decrease in the hourly potential emissions based on the maximum capacity, as a result of the 1995 changes made to the BA Coater. The changes made to the BA Coater in 1995 decreased the maximum exhaust flow rate thereby decreasing the potential emissions from 2,332 lbs/hr to 752 lbs/hr.

(2) BC-1 Coating Line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR), because none of the equipment for this coating line was constructed, reconstructed, or modified after the December 30, 1980 rule applicability date.

(A) The changes to the BC-1 Coating Line do not constitute a modification pursuant to the NSPS modification provisions of 40 CFR 60.14.

(3) BC-2 Coating Line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR) because pursuant to CP-009-9364-00004, issued on July 10, 1998:

(i) The BC-2 Coating Line was originally constructed in 1963 (prior to the applicability date of December 30, 1980);

(ii) The changes to the BC-2 Coating Line do not constitute a reconstruction because the fixed cost of the new equipment does not exceed 50% of the fixed capital cost required to construct an entirely new facility; and

(iii) The changes to the BC-2 Coating Line do not constitute a modification. The NSPS modification provisions of 40 CFR 60.14 apply when a physical or operational change occurs which could result in an increase in the hourly potential emissions, unless such change qualifies for one of the exemptions at 40 CFR 60.14(e). The emission rate before and after a physical or operational change is evaluated by comparing the hourly potential emissions under maximum capacity immediately before the change to emissions at maximum capacity after the change. Under the General Provisions of the NSPS, only physical limitations on maximum capacity are considered in determining potential emissions. There was no change to the maximum capacity or hourly potential emissions based on the maximum capacity, as a result of the 1998 changes made to the BC-2 Coater.

(4) The three (3) boilers (EU008, EU009, EU010), all constructed in 1986, are not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c,

Subpart Dc) because the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

(5) The storage tanks T001 and T006 are not subject to New Source Performance Standard, 326 IAC 12 (40 CFR 60.110 and 110a, Subparts K and Ka) because the tanks were constructed in 1988 and 1986, respectively, and the storage capacity of each tank is less than 40,000 gallons. The storage tanks T001 and T006 are not subject to New Source Performance Standard, 326 IAC 12 (40 CFR Part 60.110b, Subpart Kb), because they have a true vapor pressure of less than 15.0 kPa. Therefore these requirements are not included in this permit.

(6) Storage tank T003 is not subject to New Source Performance Standard, 326 IAC 12 (40 CFR 60.110, 110a, and 110b, Subparts K, Ka and Kb) because it was constructed in 1976, prior to the rule applicability date of July 23, 1984 for Kb, and because the storage capacity of the tank is less than 40,000 gallons for K and Ka.

(7) Storage tanks T008, T009, and T012 are not subject to New Source Performance Standard, 326 IAC 12 (40 CFR 60.110, 110a, and 110b, Subparts K, Ka and Kb) because the tanks were constructed in 1999, 1985 and 2000, respectively, and the storage tank capacity of each tank is less than 40 cubic meters for Kb.

(8) Storage tanks T002, T004, T005, T007 and T011 are not subject to New Source Performance Standard, 326 IAC 12 (40 CFR 60.110, 110a, and 110b, Subparts K, Ka and Kb) because the tanks were constructed in 1997, 1997, 1997, 1992 and 1991, respectively, and the storage capacity of each tank is less than 40 cubic meters for Kb.

(9) This source is not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ) because the affected facility to which the provisions of this subpart apply is for publication rotogravure printing press. This source does not use publication rotogravure printing press.

(10) The degreasers are not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63.460, Subpart T. The degreasers do not use any halogenated solvent cleaners.

(11) This source is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63.701, Subpart EE. This source does not have any magnetic tape manufacturing operations.

(12) This source is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63.820, Subpart KK. This source does not use publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.

(13) The source was initially constructed in 1957, prior to the August 7, 1977 (326 IAC 2-2, Prevention of Significant Deterioration (PSD)) rule applicability date. Potential volatile organic compound (VOC) emissions from the source were greater than 250 tons per year on August 7, 1977. Therefore, this source was considered a PSD major source. The source had several modifications after the

August 7, 1977 rule applicability date, as detailed below, that were not major modifications.

(A) The BA Coating Line was modified in 1995. Pursuant to CP-009-3871-00004, issued on July 14, 1995, the modification of the BA Coating Line did not trigger PSD applicability. This modification was not a major modification pursuant to 326 IAC 2-2 because the source agreed to limit future actual VOC emissions from the BA Coating Line to no more than 39 tpy above the baseline actual emissions for the existing line.

Pursuant to 326 IAC 2-2-1(b), actual emissions are generally defined in terms of the two (2) year period preceding a modification when such time-frame represents normal operations. However, the same definition provides for the use of a different 2-year period if such is more representative of normal source operations. During the permit review process for CP009-3871-00004, 3M provided information to IDEM to show that the BA Coater did not have actual emissions reflective of normal operations during any 2-year period after 1990, and that the proposed modification would result in more normal, pre-1990, operations. As such, IDEM, OAQ, agreed that the 2-year period, 1989-1990, would represent normal operations and the related average actual emission rate was determined as 967 tons VOC per year. For the BA Coating Line modification, the total VOC emission rate was limited to 967 tpy, plus 39 tpy, or 1,006 tpy.

The VOC emissions shall be limited to 1006 tons per year emissions limitations, as intended in the original construction permit approving the 1995 modification in CP009-3871-00004.The Permittee shall be required to keep records of VOC usage at BA coating line, and estimate the emissions based on the control efficiency determined at the latest valid stack test.

(B) The three (3) No. 2 Fuel Oil fired boilers, each constructed in 1986, did not trigger PSD applicability. The potential NOx emissions from each of the three (3) boilers were calculated to be 7.9 tpy, or 23.7 tpy (combined), when burning No. 2 Fuel Oil, based on the maximum boiler capacity and US EPA AP- 42 emissions factors, which is less than the PSD major modification significant emission rate threshold for NOx (as NO2) of 40 tpy. The sulfur content of the No. 2 fuel oil used for the three (3) boilers shall be limited such that combined sulfur dioxide emissions from the three (3) boilers do not exceed 40 tons (PSD major modification significant emission rate threshold for SO2) per year. Therefore, the construction of the three boilers was not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

(C) BC-2 Coating Line was modified in 1998, with the modification permitted in CP-009-9364-00004, issued on July 10, 1998. This modification was not a major modification pursuant to 326 IAC 2-2 because this source agreed to limit future VOC emissions from the BC-2 Coating Line to no more than 39 tpy above the baseline actual emissions for the line.

During the permit review process for CP009-9364, 3M provided information to IDEM to show that the BC-2 Coater did not have actual emissions reflective of normal operations during any 2-year period after 1993, and that the proposed modification would result in more normal, pre-1993, operations. As such, IDEM, OAQ, agreed that the 2-year

period, 1992-1993, would represent normal operations and the related average actual emission rate was determined as 446 tons VOC per year. For the BC-2 Coating Line modification, the total VOC emission rate was limited to 446 tpy, plus 39 tpy, or 485 tpy. Compliance with this limit ensures that 326 IAC 2-2 is not applicable to the BC-2 Coating Line.

(D) Pursuant to CP-009-3127-00004, issued on March 7, 1994, the VCS Coating Line did not trigger PSD applicability. The installation of the VCS Coating Line was approved in CP-009-3127-00004, issued on March 7, 1994. The controlled potential to emit VOC from this facility was estimated to be equal to 9.20 tpy, based on maximum VOC input of 184 tons per year and utilizing a thermal oxidizer which maintains a minimum control efficiency of 95%. The installation of VCS coating line was not subject to the requirements of 326 IAC 2-2.

(E) The extrusion line was permitted in CP-009-5147-00004, issued on June 4, 1996. The controlled potential to emit VOC from this facility was estimated to be equal to 14 tpy, utilizing a thermal oxidizer (C002) which maintains a minimum overall control efficiency of 95% and a maximum VOC input of 280 tons per year.

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC emissions (including that of clean-up solvents) at the Extrusion Line shall be less than 40 tons per year. Compliance with this limitation shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the installation of the Extrusion Line in CP-009-5147-00004, issued on June 4, 1996.

(14) This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

All the emission units and pollution control equipment for this source were constructed before the July 27, 1997 rule applicability date. Therefore the requirements of this rule do not apply to this source.

(15) The oven zones from the BA, BC-1, BC-2, VCS Coating Lines and the heaters from the Extrusion Line are not subject to 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating). The oven zones from the BA, BC-1, BC-2, VCS Coating Line and the heaters from the Extrusion Line are not indirect heating facilities.

(16) The BC-1 and BC-2 Coating Lines are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements). This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). The two (2) Coating Lines were constructed before 1980, therefore, the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) do not apply.

(17) The VCS Coating Line is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because it is subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations).

(18) The BC-1 and BC-2 Coating Lines are not subject to 326 IAC 8-2-5 (Paper Coating Operations). The two (2) Coating Lines are located in Blackford County and were constructed prior to the applicability date of January 1, 1980, specified in 326 IAC 8-2-1(a)(2).

(19) This source is not subject to 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). This rule applies to all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (thirty-nine thousand (39,000) gallons) containing volatile organic compounds whose true vapor pressure is greater than 10.5 kPa (1.52 psi). Tanks (T001-T011) are not subject to 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) because these petroleum liquid storage vessels have capacities less than 39,000 gallons.

(20) This source is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations). This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. All the facilities for this source, located in Blackford County were either constructed before October 7, 1974 or after January 1, 1980. Therefore, this rule does not apply to this source.

(23) This source is not subject to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties). The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Blackford County. Therefore, this rule is not applicable to this source.

(24) This source is not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels). On and after October 1, 1995, this rule applies to stationary vessels used to store volatile organic liquid (VOL) that are located in Clark, Floyd, Lake, or Porter County. Tanks (T001-T011) are not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels), because these tanks are located in Blackford County.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T 009-32463-00004 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.13 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [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.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

(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 Part 70 permit.

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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

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

Stratospheric Ozone Protection

C.20 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 FACILITY OPERATION CONDITIONS - One Coating Line (EU001)

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

(a) One (1) BA Coating Line, identified as EU001, constructed in 1963, consisting of the following equipment:

two (2) coating stations (coating stations 1 and 2), installed in 1963, and one (1) coating station (coating station 3), installed in 1995, each applying coatings with methods including, but not limited to, gravure, reverse roll, extrusion die, hopper/knife, and/or slot die, utilizing thermal oxidizer No. 2, identified as C002, maximum capacity at 16 MMBtu for volatile organic compound (VOC) control, and six (6) natural gas-fired drying ovens (total heat capacity 5.5 mmBTU/hr) exhausting to stack S/V 888-002.

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

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

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

Pursuant to CP-009-3871-00004 (issued on July 14, 1995) and in order to render the requirements of 326 IAC 2-2 not applicable:

(a) The total VOC emissions (after control) from the BA Coating Line shall be limited to 1,006 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) A fifteen (15) minute period per calendar month shall be allowed to exercise the purge stack dampers provided that a monthly summary including time and date of each exercising period is recorded and submitted to the OAQ upon request.

Compliance with these limits shall ensure that the emissions increase from the 1995 modification of BA Coating Line (as permitted in CP-009-3871-00004 issued on July 14, 1995) is limited to less than 40 tons per year, rendering 326 IAC 2-2 not applicable to the BA Coating Line.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

(a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the owner or operator of the BA Coating Line shall not allow the discharge into the atmosphere VOC in excess of 2.9 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.

(1) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the BA Coating Line shall be limited to no greater than the equivalent emissions, expressed as 4.79 pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

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

Where:

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;

D = Density of VOC in coating in pounds per gallon of VOC;

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

(2) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer no. 2 (C002) shall be no less than 66.5%, based on the worst case coating VOC content of 4.86 lbs/gallon coating less water, and calculated by the following equation:

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

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied (14.3 lb/gallon coating solids).

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied (4.79 lb/gallon coating solids).

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the emission limitation in Condition D.1.1(a) shall be determined based on the monthly VOC emissions from BA Coating Line as follows:

$$E_{VOC} = (u_u * W_{u,avg}) + (u_c * W_{c,avg} * (1-c_{eff}))$$

$$PTE_{VOC} = (E_{VOC,this\ month} + E_{VOC,\ last\ 11\text{-}months})$$

Where:

E_{VOC} = the monthly emissions of VOCs in tons per month

u_u = The total amount of uncontrolled coatings used in tons per month (when the capture system or thermal oxidizer is not operating)

$w_{u,avg}$ = the monthly weighted average weight percent (%) VOC of uncontrolled coatings used

u_c = the total amount of controlled coatings used in tons per month (when both the capture system and thermal oxidizer are operating)

$w_{c,avg}$ = the monthly usage weighted average weight percent (%) VOC of controlled coatings used

c_{eff} = the overall control efficiency of the control system, as determined in the most recent valid compliance test

PTE_{VOC} = the potential to emit VOCs in tons per twelve (12) consecutive month period

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall conduct a performance test to determine VOC control efficiency for the thermal oxidizer C002 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.6 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps whenever the 3-hour average temperature of the thermal oxidizer is below the minimum required temperature determined at the most recent valid stack test. A 3-hour average temperature that is below the required minimum temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with Condition D.1.2(a)(2), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Section C – Response to Excursions and 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.1.7 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring duct pressure or fan amperage. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

(b) The Permittee shall determine the 3-hour average duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.1.2.

(c) The 3-hour average duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the latest compliant stack test.

(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

(e) When, for any one reading, the 3-hr average temperature, the duct pressure or fan amperage falls outside of the appropriate range, the Permittee shall take a reasonable response. Section C - Response to Excursions and 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.

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

D.1.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission and usage limits established in Condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available not later than 30 days of the end of each compliance period.

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

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

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

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

(3) The calculated weight of the VOC per volume of coating solids, for each coating (lb VOC / gal solids).

(4) The monthly cleanup solvent usage.

(5) The total VOC usage for each month.

(6) The weight of VOC emitted for each compliance period.

(b) To document the compliance status with condition D.1.6, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature during the most recent compliant stack test.

(c) To document the compliance status with Condition D.1.7, the Permittee shall maintain continuous duct pressure or fan amperage records for the thermal oxidizer and the 3-hour average duct pressure or fan amperage used to demonstrate compliance during the latest valid stack test.

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

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1 (35).

SECTION D.2 FACILITY OPERATION CONDITIONS - Two Coating Lines (EU002 & EU003)

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

(b) One (1) BC-1 Coating Line, identified as EU002, constructed in 1963 and modified in 1986, consisting of the following equipment:

one (1) coating station, installed in 1963, and one (1) coating station installed in 1986, each applying coatings with methods including, but not limited to, pressure fed die, gravure, curtain and/or fluid bed, utilizing thermal oxidizer No. 3, identified as C003, maximum capacity at 16 MMBtu for volatile organic compound (VOC) control, and three (3) natural gas-fired drying ovens (total heat capacity 17.42 mmBTU/hr) exhausting to stack S/V 888-009.

Under 40 CFR 63.3280, Subpart JJJJ, this facility is considered an existing major source of HAP at which web coating lines are operated.

(c) One (1) BC-2 Coating Line, identified as EU003, consisting of the following equipment:

one (1) coating station, installed in 1963, applying coatings with methods including, but not limited to, wrap cast, reverse roll, gravure, and/or reverse gravure, utilizing thermal oxidizer No. 3, identified as C003, for volatile organic compound (VOC) control, and three (3) natural gas-fired drying ovens (total heat capacity 4.17 mmBTU/hr) exhausting to stack S/V 888-009. This Coating Line was changed as per a permit issued on July 10, 1998;

Under 40 CFR 63.3280, Subpart JJJJ, this facility is considered an existing major source of HAP at which web coating lines are operated.

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

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

D.2.1 PSD BACT for Volatile Organic Compounds [326 IAC 2-2] [326 IAC 2-2-3]

Pursuant to PSD/SSM 009-26249-00004, issued on March 09, 2009, the BC-1 Coating Line shall comply with the Best Available Control Technology (BACT) requirements of 326 IAC 2-2-3 as follows:

(a) VOC emissions from the BC-1 Coating Line shall be limited to 25.57 pounds per hour; and

(b) An overall control efficiency of 96% shall be maintained through the use of a thermal oxidizer.

D.2.2 PSD Minor Limit for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to CP 009-9364-00004 (issued on July 10, 1998) and in order to render the requirements of 326 IAC 2-2 not applicable:

The total VOC emissions (controlled and uncontrolled) from the BC-2 Coating Line shall be limited to 485 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits shall ensure that the emissions increase from the 1998 modification of BC-2 Coating Line (permitted in CP-009-9364-00004 issued on July 10, 1998) is limited to less than 40 tons per year, rendering 326 IAC 2-2 not applicable to the BC-2 Coating Line.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the emission limitation in Condition D.2.2 shall be determined based on the monthly VOC emissions from BC-2 Coating Line as follows:

$$E_{VOC} = (u_u * W_{u,avg}) + (u_c * W_{c,avg} * (1-c_{eff}))$$

$$PTE_{VOC} = (E_{VOC,this\ month} + E_{VOC,\ last\ 11\text{-}months})$$

Where:

E_{VOC} = the monthly emissions of VOCs in tons per month

u_u = The total amount of uncontrolled coatings used in tons per month (when the capture system or thermal oxidizer is not operating)

$w_{u,avg}$ = the monthly weighted average weight percent (%) VOC of uncontrolled coatings used

u_c = the total amount of controlled coatings used in tons per month (when both the capture system and thermal oxidizer are operating)

$w_{c,avg}$ = the monthly usage weighted average weight percent (%) VOC of controlled coatings used

c_{eff} = the overall control efficiency of the control system, as determined in the most recent valid compliance test

PTE_{VOC} = the potential to emit VOCs in tons per twelve (12) consecutive month period

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) The Permittee shall conduct a performance test to determine overall VOC control efficiency for the thermal oxidizer C003 for the BC-1 Coating Line, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.2.6 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps whenever the 3-hour average temperature of the thermal oxidizer is below 1500°F or the value established during the most recent performance test. A 3-hour average temperature that is below 1500°F (or the value established during the most recent performance test) is not a deviation from this permit. Section C – Response to Excursions and 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) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Section C – Response to Excursions and 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.2.7 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring duct pressure or fan amperage. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

(b) The Permittee shall determine the 3-hour average duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.2.1.

(c) The 3-hour average duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the latest compliant stack test.

(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

(e) When, for any one reading, the 3-hr average temperature, the duct pressure or fan amperage falls outside of the appropriate range, the Permittee shall take a reasonable response. Section C - Response to Excursions and 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.

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

D.2.8 Record Keeping Requirements

(a) To document the compliance status with condition D.2.2(a), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC input limits established in condition D.2.2(a). Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

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

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

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

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

(3) The calculated weight of the VOC per volume of coating solids, for each coating (lb VOC / gal solids).

(4) The monthly cleanup solvent usage.

(5) The total VOC usage for each month.

(6) The weight of VOC emitted for each compliance period.

(b) To document the compliance status with condition D.2.6, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

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

D.2.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1 (35).

SECTION D.3 FACILITY OPERATION CONDITIONS - One Coating Line (EU004)

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

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994, consisting of the following equipment:

(1) One (1) compounding room, constructed in 1994, exhausting to stack S/V 001-001;

(2) One (1) coating station, installed in 1994, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing thermal oxidizer No. 2, C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;

(3) One (1) coating station, approved for construction in 2007, applying coatings with methods including, but not limited to, reverse roll, gravure, reverse gravure, flexographic, and/or pressure fed die methods, utilizing an enclosure and a thermal oxidizer No. 2, C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;

(4) Four (4) natural gas-fired drying ovens, two (2) constructed in 1994 with a rated capacity of 0.80 MMBtu/hr each, two (2) constructed in 2007, with a rated capacity of 0.55 MMBTU/hr and 0.88 MMBtu/hr.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

(a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the owner or operator for the VCS Coating Line shall not allow the discharge into the atmosphere VOC in excess of 2.9 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the VCS Coating Line when using solvent-based coatings shall be limited to no greater than the equivalent emissions, expressed as 4.79 pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

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

Where:

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;

D = Density of VOC in coating in pounds per gallon of VOC;

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

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than 66.5%, based on the worst case coating VOC content of 4.86 lbs per gallon coating less water, and calculated by the following equation:

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

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied (14.31 lb/gallon solids).

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

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

D.3.2 PSD Minor Limit for Volatile Organic Compounds (VOC) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC emissions (after control) (including that of clean-up solvents) at the VCS Coating Line (EU004) shall be less than 40 tons per year. Compliance with this limitation shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the installation of the VCS Coating Line in CP-009-3127-00004, issued on March 7, 1994.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer at all times when the VCS Coating Line is operating and not coating with water-based coating solutions, to achieve compliance with condition D.3.1.

D.3.5 Testing Requirements [326 IAC 2-7-6 (1) (6)] [326 IAC 2-1.1-11]

The Permittee shall conduct a performance test to verify VOC control efficiency as required in condition D.3.1 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.6 VOC Emissions

Compliance with condition D.3.2 shall be demonstrated no later than 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to the previous 11 months total VOC emitted to determine VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be determined by using the following equation for VOC input:

VOC emitted = [(VOC input) x (100 - % overall control efficiency)]

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

D.3.7 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps whenever the 3-hour average temperature of the thermal oxidizer is below the minimum required temperature determined at the most recent valid stack test. A 3-hour average temperature that is below the required minimum temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with Condition D.1.2 (a)(2), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Section C – Response to Excursions and 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.3.8 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring duct pressure or fan amperage. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

(b) The Permittee shall determine the 3-hour average duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.3.1.

(c) The 3-hour average duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the latest compliant stack test.

(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

(e) When, for any one reading, the 3-hr average temperature, the duct pressure or fan amperage falls outside of the appropriate range, the Permittee shall take a reasonable response. Section C - Response to Excursions and 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.

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

D.3.9 Record Keeping Requirements

(a) To document the compliance status with condition D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission and usage limits established in condition D.3.1 and D.3.2. Records necessary to demonstrate compliance shall be available not later than 30 days of the end of each compliance period.

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

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

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

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

(3) The calculated weight of the VOC per volume of coating solids, for each coating used (lb VOC / gal solids).

(4) The monthly cleanup solvent usage.

(5) The total VOC input for each month.

(6) The weight of VOC emitted for each compliance period.

(b) To document the compliance status with condition D.3.7, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(c) To document the compliance status with Condition D.3.8, the Permittee shall maintain continuous duct pressure or fan amperage records for the thermal oxidizer and the 3-hour average duct pressure or fan amperage used to demonstrate compliance during the latest valid stack test.

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

D.3.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with condition D.3.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1 (35).

SECTION D.4 FACILITY OPERATION CONDITIONS - One Extrusion Line (EU005)

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

(e) One (1) Extrusion Line, identified as EU005, constructed in 1996, consisting of one (1) extruder, calendar rolls, and one (1) oven, utilizing thermal oxidizer No. 2, C002, for volatile organic compound (VOC) control, exhausting to stack S/V 888-002;.

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 009-5147-00004, issued on June 4, 1996 and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the VOC emissions from the extrusion line shall be controlled by a thermal oxidizer with a minimum overall control efficiency of 90% at all times that the extrusion line is in operation.

D.4.2 PSD Minor Limit for Volatile Organic Compounds (VOC) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC emissions (after control) (including that of clean-up solvents) at the Extrusion Line shall be less than 40 tons per year. Compliance with this limitation shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the installation of the Extrusion Line in CP-009-5147-00004, issued on June 4, 1996.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility and the 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.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer at all times when the Extrusion Line is operating to achieve compliance with Condition D.4.1.

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall conduct a performance test to verify VOC control efficiency as required in condition D.4.2 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.4.6 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated not later than 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to the previous 11 months total VOC emitted to determine VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be determined by using the following equation for VOC input:

VOC emitted = [(VOC input) x (100 - % overall control efficiency)]

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

D.4.7 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1441°F on a 3-hour average.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.4.1, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Section C – Response to Excursions and 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.4.8 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring duct pressure or fan amperage. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

(b) The Permittee shall determine the 3-hour average duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.4.1.

(c) The 3-hour average duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the latest compliant stack test.

(d) The instruments used for determining the duct pressure or fan amperage shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

(e) When, for any one reading, the 3-hr average temperature, the duct pressure or fan amperage falls outside of the appropriate range, the Permittee shall take a reasonable response. Section C - Response to Excursions and 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.

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

D.4.9 Record Keeping Requirements

(a) To document the compliance status with Conditions D.4.1, D.4.2, and D.4.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the conditions D.4.1, D.4.2, and D.4.6.

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

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

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

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

(3) The monthly cleanup solvent usage.

(4) The total VOC input for each month.

(5) The weight of VOC emitted for each compliance period.

(b) To document the compliance status with Condition D.3.7, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(c) To document the compliance status with Condition D.3.8, the Permittee shall maintain continuous duct pressure or fan amperage records for the thermal oxidizer and the 3-hour average duct pressure or fan amperage used to demonstrate compliance during the latest valid stack test.

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

D.4.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with conditions D.4.1 and D.4.2 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1 (35).

SECTION D.5 FACILITY OPERATION CONDITIONS - Three Boilers

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

(g) Three (3) boilers, identified as EU008, EU009, and EU010, each constructed in 1986, each with a maximum heat input capacity of 12.553 MMBtu per hour, each combusting natural gas and No.2 Fuel Oil, exhausting to stacks S/V 001-005, 001-006, and 001-007, respectively;

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

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

D.5.1 Sulfur Dioxide (SO2) [326 IAC 7-1.1-1] [326 IAC 2-2]

Pursuant to 326 IAC 7-1.1-1:

(a) The combined SO2 emissions from the three (3) boilers shall be no greater than five-tenths (0.5) pound per million Btu for fuel oil combustion.

(b) The maximum fuel oil sulfur content shall be limited to less than 0.24% sulfur by weight.

Compliance with D.5.1 (b) shall also satisfy the requirements of D.5.1 (a). Compliance with these limitations shall limit the SO2 emissions from the three (3) boilers to less than 40 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall make the requirements of 326 IAC 2-2 (PSD) not applicable.

D.5.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the three (3) boilers, based on a total heat input rate of 37.66 MMBtu per hour, shall be limited to 0.42 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility and the 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.5.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the three (3) 12.553 MMBtu/hr boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.5.5 Visible Emissions Notations

(a) Visible emission notations of the three (3) boiler stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere and burning oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take 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.

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

D.5.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.5.5, the Permittee shall maintain records of visible emission notations of the three (3) boiler stack exhausts once per day.

(b) To document the compliance status with Conditions D.5.1, D.5.2, and D.5.4 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Conditions D.5.1, D.5.2, and D.5.4.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil and natural gas usage since last compliance determination period;

(3) Sulfur dioxide emission rates;

(4) Analysis of fuel or a vendor analysis and a certification for sulfur content by weight; and

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

D.5.7 Reporting Requirements

The natural gas boiler certification shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the six (6) month period being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The natural gas-fired boiler certification does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.6 FACILITY OPERATION CONDITIONS - Degreasing

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

(a) Insignificant Activities:

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

(b) Die Cleaning Stations:

Three die cleaning stations identified as EUXXX, EUXXX, and EUXXX, each constructed in 1995 and used to solvent clean the coating die from EU 001, EU002 and EU003.

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

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

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

(1) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(2) If used, solvent spray:

(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

D.6.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

D.6.3 Record Keeping Requirements

To document the compliance status with Condition D.6.2, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(a) The name and address of the solvent supplier.

(b) The date of purchase.

(c) The type of solvent purchased.

(d) The total volume of the solvent purchased.

(e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

SECTION E.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) BA Coating Line, identified as EU001, constructed in 1963, exhausting to stack S/V 888-002. Under 40 CFR 63.3280 Subpart JJJJ, this is considered an existing web coating line operation.

(b) One (1) BC-1 Coating Line, identified as EU002, constructed in 1963 and modified in 1986, exhausting to stack S/V 888-009. Under 40 CFR 63.3280 Subpart JJJJ, this is considered an existing web coating line operation.

(c) One (1) BC-2 Coating Line, identified as EU003, constructed in 1963, exhausting to stack S/V 888-009. Under 40 CFR 63.3280 Subpart JJJJ, this is considered an existing web coating line operation.

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994 and 2007, exhausting to stack S/V 888-001 and stack S/V 888-002. Under 40 CFR 63.3280 Subpart JJJJ, this is considered an existing web coating line operation.

(e) One (1) Extrusion Line, identified as EU005, constructed in 1996, exhausting to stack S/V 888-002. Under 40 CFR 63.3280 Subpart JJJJ, this is considered an existing web coating line operation.

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

E.1.1 General Provisions Relating to NESHAP Subpart JJJJ [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.3340, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart JJJJ in accordance with schedule in 40 CFR 63 Subpart JJJJ.

E.1.2 Paper and other Web Coating NESHAP [40 CFR Part 63, Subpart JJJJ]

The Permittee which engages in paper and other web coating shall comply with the following provisions of 40 CFR Part 63, Subpart JJJJ (included as Attachment A of this permit).

(1) 40 CFR 63.3280;
(2) 40 CFR 63.3290;
(3) 40 CFR 63.3300;
(4) 40 CFR 63.3310;
(5) 40 CFR 63.3320;
(6) 40 CFR 63.3321;
(7) 40 CFR 63.3330(a);
(8) 40 CFR 63.3340;
(9) 40 CFR 63.3350;
(10) 40 CFR 63.3360;
(11) 40 CFR 63.3370(a),(b),(c)(1) through (5),(e),(f),(g),(h)(2),(i), and (k);
(12) 40 CFR 63.3400(a),(b)(1),(c)(1),(c)(2)(i) through (v),(d),(e),(f), and (g);
(13) 40 CFR 63.3410(a)(1);

SECTION E.2 FACILITY OPERATION CONDITIONS

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

(a) One (1) VCS Coating Line, identified as EU004, constructed in 1994 and 2007, exhausting to stack S/V 001-001 and stack S/V 888-001. Under 40 CFR 60.440 Subpart RR, this is considered an existing pressure sensitive tape and label materials coating line operation.

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

E.2.1 General Provisions Relating to NSPS Subpart RR [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12, except as otherwise specified in 40 CFR Part 60, Subpart RR.

E.2.2 Standards of Performance for Pressure Sensitive Tape and Label Materials Coating Operation NSPS [40 CFR Part 60, Subpart RR] [326 IAC 12]

The Permittee which engages in pressure sensitive tape and label materials coating shall comply with the following provisions of 40 CFR Part 60, Subpart RR, (included as Attachment B of this permit).

(1) 40 CFR 60.440;
(2) 40 CFR 60.441;
(3) 40 CFR 60.442;
(4) 40 CFR 60.443;
(5) 40 CFR 60.444;
(6) 40 CFR 60.445;
(7) 40 CFR 60.446; and
(8) 40 CFR 60.447.

SECTION E.3 FACILITY OPERATION CONDITIONS

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

(a) Three (3) boilers, identified as EU008, EU009, and EU010, each constructed in 1986, each with a maximum heat input capacity of 12.553 MMBtu per hour, each combusting natural gas and No.2 Fuel Oil, exhausting to stacks S/V 001-005, 001-006, and 001-007, respectively;

Under 40 CFR 63, Subpart DDDDD, these boilers are classified as existing units designed to burn gas 1 fuels.

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

E.3.1 General Provisions Relating to NESHAP Subpart DDDDD [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.3340, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR Part 63, Subpart DDDDD in accordance with schedule in 40 CFR 63 Subpart DDDDD.

E.3.2 Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR 63, Subpart DDDDD]

The boilers 1, 2, and 3 shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDD (included as Attachment C of this permit):

(1) 40 CFR 63.7480
(2) 40 CFR 63.7485
(3) 40 CFR 63.7490(a)(1), (d)
(4) 40 CFR 63.7495(b), (d)
(5) 40 CFR 63.7499
(6) 40 CFR 63.7500 (a)(1),(a)(2), (a)3), (b), (f)
(7) 40 CFR 63.7501(a)(1), (a)(2)(i), (a)(20(iii), (a)(3), (b), (c), (d), (e)
(8) 40 CFR 63.7505(a), (c), (d)
(9) 40 CFR 63.7510(a), (b), (c), (d), (e)
(10) 40 CFR 63.7515
(11) 40 CFR 63.7520
(12) 40 CFR 63.7521
(13) 40 CFR 63.7522
(14) 40 CFR 63.7525(a)
(15) 40 CFR 63.7530
(16) 40 CFR 63.7533
(17) 40 CFR 63.7535
(18) 40 CFR 63.7540
(19) 40 CFR 63.7541
(20) 40 CFR 63.7545
(21) 40 CFR 63.7550
(22) 40 CFR 63.7555(a), (c), (d), (e), (g), (h), (i), (j)
(23) 40 CFR 63.7560
(24) 40 CFR 63.7565
(25) 40 CFR 63.7570
(26) 40 CFR 63.7575

SECTION E.4 FACILITY OPERATION CONDITIONS

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

(a) Emergency Generator constructed April 1, 2008, with a maximum capacity of 195 HP, combusting natural gas.

(b) One (1) diesel-fired emergency generator, constructed in January 1993, with a maximum capacity of 67.05 HP.

(c) One (1) diesel-fired stationary fire pump, constructed in October 1974, with a maximum capacity of 225 HP.

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

E.4.1 General Provisions Relating to NESHAP Subpart ZZZZ [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.3340, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR Part 63, Subpart ZZZZ in accordance with schedule in 40 CFR 63 Subpart ZZZZ.

E.4.2 Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

The 67.05 HP diesel-fired emergency generator shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment D of this permit):

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(a), (b)
(3) 40 CFR 63.6590(a)(1)(ii)
(4) 40 CFR 63.6595(a)(1)
(5) 40 CFR 63.6602
(6) 40 CFR 63.6605
(7) 40 CFR 63.6612
(8) 40 CFR 63.6615
(9) 40 CFR 63.6620(a), (d), (e)
(10) 40 CFR 63.6630(a), (b), (c),
(11) 40 CFR 63.6635
(12) 40 CFR 63.6640(a), (b), (e), (f)
(13) 40 CFR 63.6645(a)(5)
(14) 40 CFR 6650
(15) 40 CFR 6655
(16) 40 CFR 6660
(17) 40 CFR 6665
(18) 40 CFR 6670
(19) 40 CFR 6675

The 225 HP diesel-fired emergency generator shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment D of this permit):

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(a), (b)
(3) 40 CFR 63.6590(a)(1)(ii)
(4) 40 CFR 63.6595(a)(1)

(5) 40 CFR 63.6602
(6) 40 CFR 63.6605
(7) 40 CFR 63.6612
(8) 40 CFR 63.6615
(9) 40 CFR 63.6620(a), (d), (e)
(10) 40 CFR 63.6630(a), (b), (c),
(11) 40 CFR 63.6635
(12) 40 CFR 63.6640(a), (b), (e), (f)
(13) 40 CFR 63.6645(a)(1), (f), (g), (h)
(14) 40 CFR 6650
(15) 40 CFR 6655
(16) 40 CFR 6660
(17) 40 CFR 6665
(18) 40 CFR 6670
(19) 40 CFR 6675

The 195 HP natural gas-fired emergency generator shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment D of this permit):

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(a), (b)
(3) 40 CFR 63.6590(a)(2)(ii)
(4) 40 CFR 63.6590(c)(7)
(5) 40 CFR 63.6665
(6) 40 CFR 63.6670
(7) 40 CFR 63.6675

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: 3M Hartford City
Source Address: 304 S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-32463-00004

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

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)
- ☐ Report (specify)
- ☐ Notification (specify)
- ☐ Affidavit (specify)
- ☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: 3M Hartford City
Source Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-32463-00004

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) 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

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: 3 M Hartford City
Source Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-32463-00004

☐ Natural Gas Only
☐ Alternate Fuel burned
From:_____ To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

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

Part 70 Quarterly Report

Source Name: 3 M Hartford City
Source Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-32463-00004
Facility: BA Coating Line
Parameter: VOC emissions (after control)
Limit: BA Coating Line VOC emissions shall be limited to 1006 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Year: _____

Month	VOC Emissions (tons) This Month	VOC Emissions (tons) Previous 11 Months	VOC Emissions (tons) 12 Month total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:_____
Title / Position:_____
Signature:_____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: 3 M Hartford City
Source Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-32463-00004
Facility: BC-2 Coating Line
Parameter: VOC Emissions (after control)
Limit: VOC emissions shall not exceed 485 tons per twelve (12) consecutive month period, with compliance determined at the end of each month based on the formula below.

Year: _____

Month	Uncontrolled Coatings Usage This Month (tons/month)	Volume Weighted Average VOC Content of Uncontrolled Coatings Used This Month (wt.%)	Weight of Uncontrolled VOCs Emitted This Month (tons/month)	Controlled Coatings Usage This Month (tons/month)	Volume Weighted Average VOC Content of Controlled Coatings Used This Month (wt.%)	Weight of Controlled VOCs Emitted This Month (tons/month)	Total Weight of Controlled and Uncontrolled VOCs Emitted This Month (tons/month)	Total Weight of Controlled and Uncontrolled VOCs Emitted Last 12 Months (tons/12 month)	Limit
									485
									485
									485

$E_{VOC} = (u_u * W_{u,avg}) + (u_c * W_{c,avg} * (1-c_{eff}))$

$PTE_{VOC} = (E_{VOC,this\ month} + E_{VOC,\ last\ 11\text{-}months})$

where:
- E_{VOC} = the monthly emissions of VOCs in tons per month
- u_u = The total amount of uncontrolled coatings used in tons per month (when the capture system or thermal oxidizer is not operating)
- $w_{u,avg}$ = the monthly usage weighted average weight percent (%) VOC of uncontrolled coatings used
- u_c = the total amount of controlled coatings used in tons per month (when both the capture system and thermal oxidizer are operating)
- $w_{c,avg}$ = the monthly usage weighted average weight percent (%) VOC of controlled coatings used
- c_{eff} = the overall control efficiency of the control system
- PTE_{VOC} = the potential to emit VOCs in tons per twelve (12) consecutive month period

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:_____
Title / Position:_____
Signature:_____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: 3 M Hartford City
Source Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-32463-00004
Facility: VCS Coating Line
Parameter: VOC emissions (after control)
Limit: The VCS Coating Line VOC emissions shall be limited to less than 40 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Year: _____

Month	VOC Emissions (tons) This Month	VOC Emissions (tons) Previous 11 Months	VOC Emissions (tons) 12 Month total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:_____
Title / Position:_____
Signature:_____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: 3 M Hartford City
Source Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-32463-00004
Facility: Extrusion Line
Parameter: VOC emissions (after control)
Limit: Extrusion Line VOC input shall be limited to less than 40 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Year: _____

Month	VOC Emissions (tons) This Month	VOC Emissions (tons) Previous 11 Months	VOC Emissions (tons) 12 Month total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:_____
Title / Position:_____
Signature:_____
Date: _____
Phone: _____

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

PART 70 OPERATING PERMIT

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: 3 M Hartford City
Source Address: 304S 075E, Hartford City, Indiana 47348
Part 70 Permit No.: T009-32463-00004

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Appendix A: Emission Calculations
Compounding/Mix & Mill Emission Calculations

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

Operating Data (provided by the source):

Total Solvent Input:

BA Coating Line[1]	5040	tons/yr	
BC-1 Coating Line	2800	tons/yr	
BC-2 Coating Line[2]	2287.74	tons/yr	
VCS Coating Line	184	tons/yr	
PTFE Extrusion Line	280	tons/yr	
TOTAL	**10591.74**	**tons/yr**	
	3530580	**gal/yr**	solvent density = 6 lb/gal

Maximum Throughput	7061160	gal/yr
Maximum Daily Temperature	85	deg. F
Methanol Vapor Pressure	3.06	psi (@85 deg. F.)
Total Tank Storage Capacity	72625	gal

[1] The total solvent input is based on a maximum typical VOC input. The PSD minor limit for BA lIne is 1006 tons per year of VOC emissions
[2] The total solvent input is based on a maximum typical VOC input.. The PSD minor limit for BC-2 Line is 485 tons per year of VOC emissions.

VOC Emission Calculations

Lw, Working Loss = (2.38 * 10^-5) * Mv * Pva * Q * Kn * Kp

Mv =	Vapor Molecular Wt.	32	lb/lb-mol	(for methanol)	N, Turnovers = Total throughput (gal / Total tank capacity (gal)	
Pva =	Vapor Pressure	3.06	psi		N =	97.22767642
Q =	Net Throughput	7061160	gal/yr		Kn, Turnover Factor = (180 + N) / (6 * N)	
Kn =	Turnover factor	0.75	(always less than or equal to 1)		Kn =	0.475220785
Kp =	Working Loss Product Factor	1	(for all organic liquids)			
Lw =	**Working Loss**	**12342.00**	**lb VOC/yr**			
		6.171	**ton/yr**			

Methodology:
Maximum throughput is assumed to be twice the facility solvent usage to account for opening tank lids to add solids during batch cycle.
Methanol has the highest vapor pressure of the chemicals used at the Hartford City Plant, therefore, was used as the "worst case solvent".
Calculations for Working Loss is based on AP-42, Chapter 7.1.

HAP Emission Calculations

HAP	Weight %	Total HAP (tons/yr)
Benzene	0.002	0.01
Ethyl Benzene	0.25	1.54
N-Hexane	0.05	0.31
Methanol	**1**	**6.17**
Methyl Isobutyl Ketone	**1**	**6.17**
Toluene	**1**	**6.17**
Xylene	**1**	**6.17**

(Bold) Worst Case Solvents

Methodology:
HAP Emissions (tons/yr) = Weight % * VOC Working Loss (ton/yr)

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

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

BC-1 Oven Zone 1	8.53
BC-1 Oven Zone 2	5.686
BC-1 Oven Zone 3	3.2
BC-2 Oven Zone 4	3.3
BC-2 Oven Zone 5	3.3
BC-2 Oven Zone 6	0.87
BA Coating Ovens	3.5
VCS Coater	3.03
PTFE Extruder	0.786
Total for Natural Gas Sources	**32.202**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
32.2	1020	276.6

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.26	1.05	1.05	0.08	13.83	0.76	11.62

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

Methodology

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

See page 2 for HAPs emissions calculations.

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

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.904E-04	1.659E-04	1.037E-02	2.489E-01	4.701E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.914E-05	1.521E-04	1.936E-04	5.255E-05	2.904E-04

Methodology is the same as page 1. Total 2.610E-01

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 3 for Greenhouse Gas calculations.

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

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	16,594	0.3	0.3
Summed Potential Emissions in tons/yr	16,594		
CO2e Total in tons/yr	16,694		

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

VOC and HAP Emission Calculations - Surface Coating Operations

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

UNCONTROLLED (LIMITED) POTENTIAL EMISSIONS**

Process	VOC Emissions * Potential to Emit (ton/yr)	Weight % Xylene	Weight % Toluene	Weight % Benzene	Weight % N -Hexane	Weight % Ethyl Benzene	Weight % Methanol	Weight % MIBK	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Benzene Emissions (tons/yr)	N -Hexane Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Methanol Emissions (tons/yr)	MIBK Emissions (tons/yr)
BA Coating Line	(a)	1%	1%	0.002%	0.05%	0.25%	1%	1%							
BC-1 Coating Line	(a)	1%	1%	0.002%	0.05%	0.25%	1%	1%				(b)			
BC-2 Coating Line	(a)	1%	1%	0.002%	0.05%	0.25%	1%	1%							
VCS Coating Line*	(a)	1%	1%	0.002%	0.05%	0.25%	1%	1%							
Total (tons per year)	**>250**								**>10**	**>10**	**<10**	**<10**	**<10**	**>10**	**>10**

* Based on CP -009-3127-00004 issued on March 7, 1994
** Uncontrolled and unlimited emissions of VOC are greater than 250 tons per year.
(a) Uncontrolled VOC emissions are greater than 250 tons per year for the entire source
(b) Uncontrolled HAP emissions (single HAP) based on %HAP * (greater than 250 tons per year) total VOC emissions

Total HAPs= **>25** **tons/yr**

CONTROLLED POTENTIAL EMISSIONS

Process	** Control Efficiency	VOC Emissions * Potential to Emit (ton/yr)	Weight % Xylene	Weight % Toluene	Weight % Benzene	Weight % N -Hexane	Weight % Ethyl Benzene	Weight % Methanol	Weight % MIBK	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Benzene Emissions (tons/yr)	N -Hexane Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Methanol Emissions (tons/yr)	MIBK Emissions (tons/yr)
BA Coating Line#	0.95	1006.00	1%	1%	0.002%	0.05%	0.25%	1%	1%	10.06	10.06	0.02	0.50	2.52	10.06	10.06
BC-1 Coating Line#	0.96	112	1%	1%	0.002%	0.05%	0.25%	1%	1%	1.12	1.12	0.00	0.06	0.28	1.12	1.12
BC-2 Coating Line#	0.96	485.0	1%	1%	0.002%	0.05%	0.25%	1%	1%	4.85	4.85	0.01	0.24	1.21	4.85	4.85
VCS Coating Line	0.95	40	1%	1%	0.002%	0.05%	0.25%	1%	1%	0.40	0.40	0.00	0.02	0.10	0.40	0.40
Total Controlled Potential Emissions		**1643.00**								**16.43**	**16.43**	**0.03**	**0.82**	**4.11**	**16.43**	**16.43**

* Potential to Emit based on realistic product solvent usages as reported by the source.
** Control effiency based on thermal oxidizers.
# BA, BC-1, and BC-2 all have VOC emissions limitations

controlled **TOTAL HAP (tons/yr) =** **70.68**

METHODOLOGY
Uncontrolled HAPS emission rate (tons/yr) = VOC Emissions * Weight % HAP
Controlled HAPS emission rate (tons/yr) = VOC Emissions * (1 - control efficiency) * Weight % HAP
BA Coating Line has a required control efficiency of 66.5%. However, it shares TO (C002) with VCS coating line with a 95% control efficiency

Compliance with 326 IAC 8-2-5 (Paper Coating Operations)
The following calculation demonstrates compliance with the allowable VOC emissions of 2.9 pounds per gallons of coating, excluding water.

BA Coating Line

Worst Case Solvent Used (before controls)	4.86	lbs/gal	(reported by source)
Control Efficiency	0.95		
Worst Case Solvent Used (after controls)	0.243	lb/gal	**WILL COMPLY**

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

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

Thermal Oxidizer No 2. (Smith) =	16	MMBtu/hr
Thermal Oxidizer No 3. (PEI) =	16	MMBtu/hr

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
32.0	1020	274.8

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.26	1.04	1.04	0.08	13.74	0.76	11.54

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

Methodology

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

See page 2 for HAPs emissions calculations.

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

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.886E-04	1.649E-04	1.031E-02	2.473E-01	4.672E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.871E-05	1.512E-04	1.924E-04	5.222E-05	2.886E-04

Methodology is the same as page 1. Total = 2.593E-01

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 3 for Greenhouse Gas calculations.

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

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	16,489	0.3	0.3
Summed Potential Emissions in tons/yr	16,490		
CO2e Total in tons/yr	16,590		

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

Appendix A: Emissions Calculations
Three (3) Boilers - EU008, EU009, EU010
#1 and #2 Fuel Oil

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
37.659	2356.377429	0.5

Note: Each boiler is 12.553 MMBtu/hr

	Pollutant						
	PM*	PM10	direct PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	2.3	1.6	78.5 *(157S)*	24.0	0.20	5.0
Potential Emission in tons/yr	2.36	2.71	1.83	92.49	28.28	0.24	5.89

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-02-005-01/02/03) Supplement E 9/98
*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

Appendix A: Emissions Calculations
Three (3) Boilers - EU008, EU009, EU010
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	6.60E-04	4.95E-04	4.95E-04	4.95E-04	1.48E-03

	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	4.95E-04	9.90E-04	4.95E-04	2.47E-03

Methodology Total 8.08E-03

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

See Page 3 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations
Three (3) Boilers - EU008, EU009, EU010
#1 and #2 Fuel Oil
Greenhouse Gas Emissions

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/kgal	21,500	0.216	0.26
Potential Emission in tons/yr	25,331	0.3	0.3
Summed Potential Emissions in tons/yr	25,332		
CO2e Total in tons/yr	25,431		

Methodology

The CO2 Emission Factor for #1 Fuel Oil is 21500. The CO2 Emission Factor for #2 Fuel Oil is 22300.

Emission Factors are from AP 42, Tables 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/99 (see erata file)

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations
Natural Gas Combustion - Boilers 1, 2, 3 (EU008, 009 and 010)
MM BTU/HR <100

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
37.7	1020	323.4

Note: Each boiler is 12.553 MMBtu/hr

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.31	1.23	1.23	0.10	16.17	0.89	13.58

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

Methodology

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

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion - Boilers 1, 2, 3 (EU008, 009 and 010)
MM BTU/HR <100
HAPs Emissions

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.396E-04	1.941E-04	1.213E-02	2.911E-01	5.498E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.086E-05	1.779E-04	2.264E-04	6.145E-05	3.396E-04

Methodology is the same as page 1. Total 3.052E-01

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 3 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Natural Gas Combustion - Boilers 1, 2, 3 (EU008, 009 and 010)
Greenhouse Gas Emissions

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	19,405	0.4	0.4
Summed Potential Emissions in tons/yr	19,406		
CO2e Total in tons/yr	19,524		

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

Appendix A: Emissions Calculations
Natural Gas Emergency Generator
MM BTU/HR <100 4SLB

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr	
1.4	1020	0.7	195.0 HP

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBTu	3.84E-02	4.83E-02	4.83E-02	5.88E-04	3.17E+00	1.20E-01	3.72E+00
					**see below		
Potential Emission in tons/yr	0.01	0.02	0.02	0.00	1.11	0.04	1.30

*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 from AP-42 Section 3.2 (Natural Gas-Fired Reciprocating Engines - 7/00). Worst case emissions used.
** Conversion of brake HP to MMBtu/hr obtained from AP-42 Section 3.3 (Reference for Table 3.3-1 - average brake-specific fuel consumption (BSFC) of 7,000 Btu/hp-hr wa
195 HP-hr * 7000 BTU/hp-hr * 1 MMBtu/10^6 BTU = 1.4 MMBtu/hr

See page 2 for HAPs emissions calculations.

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

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

	HAPs - Organics				
	Acetaldehyde	Acrolein	Benzene	Formaldehyde	n-Hexane
Emission Factor in lb/MMcf	8.4E-03	7.8E-03	1.9E-03	5.5E-02	1.1E-03
Potential Emission in tons/yr	2.926E-03	2.723E-03	6.790E-04	1.932E-02	3.885E-04

Methodology is the same as page 1. Total = 2.604E-02

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 3 for Greenhouse Gas calculations.

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

Company Name: **3 M Hartford City Plant**
Address City IN Zip: **304S 075E, Hartford City, IN 47348**
AA No.: **009-33795-00004**
Part 70 No.: **T 009-32463-00004**
issued: **9/5/2013**
Reviewer: **Anh Nguyen**
Date: **10/21/13**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	116.89	2.20E-03	2.20E-04
Potential Emission in tons/yr	41	0	0
Summed Potential Emissions in tons/yr	41		
CO2e Total in tons/yr	41		

Methodology
40 CFR Part 98 Subpart C (EPA GHG Mandatory Reporting Rule), final rule published in Federal Register 10/30/09 and revisions to the final rule published in the Federal Register 12/17/10.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Potential Throughput (MMBtu/yr) = [Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operated per Year]

Appendix A: Emission Calculations
Tank HAP Emissions - Maximum PTE

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

Tank Number	Tank ID Number	Outdoor/ Indoor	Product Stored	** Hazardous Air Pollutants (in tons per year)								
				Benzene	Ethyl Benzene	Formaldehyde	N-Hexane	Methanol	MIBK	Toluene	Xylene	Total
1	T001	Outdoor	Toluene	---	---	---	---	---	---	0.74	---	0.74
3	T003	Outdoor	MEK	---	---	---	---	---	---	---	---	0
6	T006	Outdoor	No. 2 Fuel Oil	---	---	---	---	---	---	---	---	0
8	T008	Outdoor	Diesel Fuel	---	---	---	---	---	---	---	---	---
9	T009	Outdoor	Gasoline	---	---	---	---	---	---	---	---	---
12	T012	Outdoor	Diesel Fuel	---	---	---	---	---	---	---	---	---
7	T007	Indoor	Waste*	0.06	0.06	---	0.06	0.06	0.06	0.06	0.06	0.06
4	T004	Indoor	MEK	---	---	---	---	---	---	---	---	0
2	T002	Indoor	Toluene	---	---	---	---	---	---	0.05	---	0.05
5	T005	Indoor	Heptane	---	---	---	---	---	---	---	---	0
11	T011	Indoor	Inactive	---	---	---	---	---	---	---	---	---
Total HAP	**(tons per year)**			**0.06**	**0.06**	**0**	**0.06**	**0.06**	**0.06**	**0.85**	**0.06**	**0.85**

Note: All storage tank emissions estimated using EPA's TANKS 3.0 software program.

* Waste tank emissions were predicted for methanol, since methanol has the highest vapor pressure of the solvents stored in the tank.

** Hazardous Air Pollutant Emissions are provided for each solvent that could be stored in the tank.

Appendix A: Emission Calculations
Tank VOC Emissions - Maximum PTE

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

Tank Number	Tank ID Number	Outdoor/ Indoor	Product Stored	Losses (Tons per Year)		Total VOC
				Standing	Working	Tons/yr
1	T001	Outdoor	Toluene	0.19	0.55	0.74
3	T003	Outdoor	MEK	0.1	0.71	0.81
6	T006	Outdoor	No. 2 Fuel Oil	0.00	0.00	0.00
8	T008	Outdoor	Diesel	0.00	0.00	0.00
9	T009	Outdoor	Gasoline	0.00	0.00	0.00
12	T012	Outdoor	Diesel	0.00	0.00	0.00
7	T007	Indoor	Waste*	0.01	0.05	0.06
4	T004	Indoor	MEK	0.00	0.15	0.15
2	T002	Indoor	Toluene	0.00	0.05	0.05
5	T005	Indoor	Heptane	0.00	0.12	0.12
11	T011	Indoor	Inactive			
Total VOC				**0.30**	**1.63**	**1.93**

Note: All storage tank emissions estimated using EPA's TANKS 3.0 software program.

* Waste tank emissions were predicted for methanol, since methanol has the highest vapor pressure of the solvents stored in the tank.

Appendix A: Emission Calculations
Diesel Emergency Generator
Output Rating (<600 HP)
Maximum Input Rate (>4.2 MMBtu/hr)

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	67.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	33,500
Sulfur Content (S) of Fuel (% by weight)	0.050

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	2.20E-03	2.20E-03	2.20E-03	2.05E-03	3.10E-02	2.51E-03	6.68E-03
Potential Emission in tons/yr	0.04	0.04	0.04	0.03	0.52	0.04	0.11

*PM10 emission factor in lb/hp-hr was calculated using the emission factor in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Hazardous Air Pollutants (HAPs)

	Pollutant								
	Benzene	Toluene	Xylene	Formaldehyde	Acetaldehyde	Acrolein	1,3-Butadiene	Naphthalene	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	8.26E-06	5.37E-06	6.48E-07	2.74E-07	5.94E-07	2.65E-05
Potential Emission in tons/yr	1.09E-04	4.80E-05	3.34E-05	1.38E-04	8.99E-05	1.08E-05	4.58E-06	9.94E-06	4.44E-04

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)
****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	**8.89E-04**

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/hp-hr	163.05	6.61E-03	1.32E-03
Potential Emission in tons/yr	1.91E+01	7.75E-04	1.55E-04

Summed Potential Emissions in tons/yr	**1.91E+01**
CO2e Total in tons/yr	**1.92E+01**

Methodology
40 CFR Part 98 Subpart C (EPA GHG Mandatory Reporting Rule), final rule published in Federal Register 10/30/09 and revisions to the final rule published in the Federal Register 12/17/10.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Potential Throughput (MMBtu/yr) = [Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operated per Year]
Potential Emission (tons/yr) = [Potential Throughput (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2,000 lb/ton]
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations

Emissions Summary

Die Cleaning Permit Application

Company Name: **3 M Hartford City Plant**

Address City IN Zip: **304S 075E, Hartford City, IN 47348**

AA No.: **009-33795-00004**

Part 70 No.: **T 009-32463-00004**

issued: **######**

Reviewer: **Anh Nguyen**

Date: **######**

[redacted]

Actual Emissions based on Mass Balance:

Based on actual use information obtained during a study completed August, 2013:

- Approximately 11.3 lb of MEK evaporated off during a die cleaning cycle and the rest of the MEK discarded as hazardous waste.
- Actual emissions are calculated assuming that one cleaning cycles occur per day for each Die Cleaning Station for a total of 3 cycles per day.
- Assume the unit is running 5 days per week, 52 weeks per year (260 days per year)

Daily Emissions MEK = $11.3 \frac{\text{lb MEK Emitted}}{\text{cycle}} \times 3 \frac{\text{Cycles}}{\text{day}} = 33.9 \frac{\text{lb MEK Emitted}}{\text{day}}$

Annual Emissions MEK = $33.9 \frac{\text{lb MEK Emitted}}{\text{day}} \times 260 \frac{\text{days}}{\text{year}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 4.4 \frac{\text{tons of MEK Emitted}}{\text{year}}$

Appendix A: Emission Calculations
Diesel Emergency Fire Pump
Output Rating (<600 HP)
Maximum Input Rate (>4.2 MMBtu/hr)

Company Name:	**3 M Hartford City Plant**
Address City IN Zip:	**304S 075E, Hartford City, IN 47348**
AA No.:	**009-33795-00004**
Part 70 No.:	**T 009-32463-00004**
issued:	**9/5/2013**
Reviewer:	**Anh Nguyen**
Date:	**10/21/13**

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	255.0	Emergency Fire Pump
Maximum Hours Operated per Year	500	
Potential Throughput (hp-hr/yr)	127,500	
Sulfur Content (S) of Fuel (% by weight)	0.050	

	Pollutant						
	PM	PM10	direct PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr*	2.20E-03	2.20E-03	2.20E-03	2.05E-03	3.10E-02	2.51E-03	6.68E-03
Potential Emission in tons/yr	0.14	0.14	0.14	0.13	1.98	0.16	0.43

* Emission factors from AP-42 Section 3.3 (Gasoline and Diesel Industrial Engines), Table 3.3-1.

Hazardous Air Pollutants (HAPs)

	Pollutant								
	Benzene	Toluene	Xylene	Formaldehyde	Acetaldehyde	Acrolein	1,3-Butadiene	Naphthalene	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	8.26E-06	5.37E-06	6.48E-07	2.74E-07	5.94E-07	2.65E-05
Potential Emission in tons/yr	4.16E-04	1.83E-04	1.27E-04	5.27E-04	3.42E-04	4.13E-05	1.74E-05	3.78E-05	1.69E-03

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)
****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	**3.38E-03**

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/MMBtu	163.05	6.61E-03	1.32E-03
Potential Emission in tons/yr	72.76	2.95E-03	5.89E-04

Summed Potential Emissions in tons/yr	**72.76**
CO2e Total in tons/yr	**73.01**

Methodology
40 CFR Part 98 Subpart C (EPA GHG Mandatory Reporting Rule), final rule published in Federal Register 10/30/09 and revisions to the final rule published in the Federal Register 12/17/10.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Potential Throughput (MMBtu/yr) = [Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operated per Year]
Potential Emission (tons/yr) = [Potential Throughput (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2,000 lb/ton]
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations

Emissions Summary

Company Name: 3 M Hartford City Plant
Address City IN Zip: 304S 075E, Hartford City, IN 47348
AA No.: 009-33795-00004
Part 70 No.: T 009-32463-00004
issued: 9/5/2013
Reviewer: Anh Nguyen
Date: 10/21/13

Emission Units	Uncontrolled/Unlimited Potential To Emit (tons/year)									
	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Single HAP	Total HAP	CO2e
BA Coating Line (a)	0.00	0.00	0.00	0.00	0.00	5040.00	0.00			0.00
BC-1 Coating Line (a)	0.00	0.00	0.00	0.00	0.00	2800.00	0.00	>10	>25	0.00
BC-2 Coating Line (a)	0.00	0.00	0.00	0.00	0.00	2287.74	0.00			0.00
VCS Coating Line (a)	0.00	0.00	0.00	0.00	0.00	184.00	0.00			0.00
Extrusion Line[(b)]	0.00	0.00	0.00	0.00	0.00	280.00	0.00	0.00	0.00	0.00
Compounding	0.00	0.00	0.00	0.00	0.00	6.17	0.00	6.17	6.17	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.00	1.93	0.00	0.85	0.85	0.00
Boilers 1, 2, 3*	2.36	2.71	1.83	92.49	28.28	0.89	13.58	0.29	0.31	25,431
Emergency Generator-NC	0.01	0.02	0.02	0.00	1.11	0.04	1.30	0.02	0.03	41
Emergency Diesel Gen.	0.04	0.04	0.04	0.03	0.52	0.04	0.11	0.00	0.00	19
Insignificant Activities - N	0.26	1.05	1.05	0.08	13.83	0.76	11.62	0.25	0.26	16,694
Thermal Oxidizers	0.26	1.04	1.04	0.08	13.74	0.76	11.54	0.25	0.26	16,590
3 die units	0.00	0.00	0.00	0.00	0.00	**4.41**	0.00	0.00	0.00	0.00
FirePump	0.14	0.14	0.14	0.13	1.98	**0.16**	**0.43**	0.00	0.00	73.01
Total (a)	**3.07**	**5.00**	**4.12**	**92.82**	**59.45**	**10606.90**	**38.58**	**7.83**	**7.88**	**58848.75**

Methodology

* Boilers 1,2, 3 can combust natural gas or fuel oil. Worst-case scenario has been included for all pollutants

VOC emissions: BA Coating Line - Based on VOC emission limitation under 326 IAC 2-2 of 1006 tons per year and 95% control eff. (VCS Line has 95% req. and is controlled by the same TO)

BC-1 Based on VOC emissions limit of 25.57 lb/hr and a minimum 96% control efficiency.

BC-2 has a VOC emission limitation of 485 tons per year. It is controlled by C003 which has a required efficiency of 96% (also controls BC-1)

VCS line permitted in CP-009-3127-00004 has maximum VOC input of 184 tons per year

Extrusion Line (permitted in CP-009-5147-00004) has estimated maximum VOC input of 280 tons per year

(a) This is a PSD major source and has a controlled emissions of greater than 250 tons per year of VOC. Uncontrolled emissions are therefore > 250 tons per year

[(b)] The HAP emissions for extrusion is assumed to be negligible. It is kept at a temperature where hazardous decomposition resulting in HAPS would not occur.

Emission Units	Controlled/Limited Potential To Emit (tons/year)									
	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Single HAP	Total HAP	CO2e
BA Coating Line	0.00	0.00	0.00	0.00	0.00	1006.00	0.00			0
BC-1 Coating Line	0.00	0.00	0.00	0.00	0.00	112.00	0.00	16.43	70.68	0
BC-2 Coating Line	0.00	0.00	0.00	0.00	0.00	485.00	0.00			0
VCS Coating Line	0.00	0.00	0.00	0.00	0.00	40.00	0.00			0
Extrusion Line	0.00	0.00	0.00	0.00	0.00	40.00	0.00	0.00	0.00	0
Compounding	0.00	0.00	0.00	0.00	0.00	6.17	0.00	6.17	6.17	0
Storage Tanks	0.00	0.00	0.00	0.00	0.00	1.93	0.00	0.85	0.85	0
Boilers 1, 2, 3	2.36	2.71	1.83	92.49	28.28	0.89	13.58	0.29	0.31	25,431
Emergency Generator NC	0.01	0.02	0.02	0.00	1.11	0.04	1.30	0.02	0.03	41
Diesel Emergency Gen.	0.04	0.04	0.04	0.03	0.52	0.04	0.11	0.00	0.00	19
Thermal Oxidizers	0.26	1.04	1.04	0.08	13.74	0.76	11.54	0.25	0.26	16,590
Insignificant Activities - N	0.26	1.05	1.05	0.08	13.83	0.76	11.62	0.25	0.26	16,694
die cleaning units	0.00	0.00	0.00	0.00	0.00	**4.41**	0.00	0.00	0.00	0.00
FirePump	0.14	0.14	0.14	0.13	1.98	0.16	0.43	0.00	0.00	73.01
Total Emissions =	**3.07**	**5.00**	**4.12**	**92.82**	**59.45**	**1698.16**	**38.58**	**>10**	**78.56**	**58,848.75**

Methodology

BA Coating Line is controlled by a thermal oxidizer C002 with a minimum control efficiency of 66.5%. However, the same TO also controls VCS line and hads 95% min eff. Requirement

BA Coating Line has an emission limitation of 1006 tons per year

BC-1 Coating Line has a VOC emission limitation of 25.57 lb/hr pursuant to PSD BACT

BC-1 Coating Line has a VOC minimum control efficiency of 96% under PSD BACT. Uncontrolled emissions = limited VOC (lb/hr)/(1-control eff.)

BC-2 Coating Line has a VOC emission limitation of 485 tons per year

VCS Coating Line (emission limit - 40 tpy) is controlled by C002 with a minimum required control efficiency of 95%

The extrusion line (emission limit = 40 tpy) is controlled by a thermal oxidizer with a minimum control efficiency of 95%.

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: Russell Edmonds
3M Hartford City
304S 075 E
Hartford City, IN 47348

DATE: November 26, 2013

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

SUBJECT: Final Decision
Administrative Amendment
009-33795-00004

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Scott Pretzsch – Plant Manager
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 11/26/2013 3M - Hartford City 009-33795-00004 Final			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

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1		Russell D Edmonds 3M - Hartford City 304S 075E Hartford City IN 47348 (Source CAATS) via confirmed delivery									
2		Scott Pretzsch Plant Mgr 3M - Hartford City 304S 075E Hartford City IN 47348 *(RO CAATS)*									
3		Blackford County Commissioners 110 West Washington Street Hartford City IN 47348 *(Local Official)*									
4		Hartford City Council and Mayors Office 700 N. Walnut Street Hartford City IN 47348 *(Local Official)*									
5		Blackford County Health Department 506 E. Van Cleve Street Hartford City IN 47348-1846 *(Health Department)*									
6		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 *(Affected Party)*									
7		Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 *(Affected Party)*									
8		Mr. Dan Baughey 1610 W Water Street #D Hartford City IN 47348 *(Affected Party)*									
9											
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