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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To:	Interested Parties
Date:	February 9, 2015
From:	Matthew Stuckey, Chief Permits Branch Office of Air Quality
Source Name:	3M Hartford City
Permit Level:	Title V Significant Permit Modification
Permit Number:	009-35102-00004
Source Location:	304 South 075 East Hartford City, Indiana
Type of Action Taken:	Modification at an existing source

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: http://www.in.gov/apps/idem/caats/
To view the document, select Search option 3, then enter permit 35102.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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

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Mr. Russ Edmonds
3M Hartford City
0304S 075E
Hartford City, IN 47348

February 9, 2015

Re: 009-35102-00004
Significant Permit Modification to
Part 70 Renewal No.: T009-32463-00004

Dear Mr. Edmonds:

3M Hartford City was issued a Part 70 Operating Permit Renewal No. 009-32463-00004 on September 5, 2013 for a stationary tape, label and extruded web manufacturing plant located at 304S 075E, Hartford City, Indiana 47348. An application requesting changes to this permit was received on November 3, 2014. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references, below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A - 40 CFR 63, Subpart JJJJ, Paper and Web Coating Operations]

Attachment B - 40 CFR 60, Subpart RR, Pressure Sensitive Tape and Label Materials Coating Operations

Attachment C - 40 CFR 63, Subpart DDDDD, Industrial, Commercial, and Institutional Boilers and Process Heaters

Attachment D - 40 CFR 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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 Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

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 Josiah Balogun, of my staff, at 317-234-5257or 1-800-451-6027, and ask for extension 4-5257.

Sincerely,

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

Attachment(s): Updated Permit, Technical Support Document and Appendix A

TS/JB

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

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Michael R. Pence
Governor

Thomas W. Easterly
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: Original Signed by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 5, 2013 Expiration Date: September 5, 2018

First Administrative Amendment No 009-33795-00004, issued on November 26, 2013
Second Administrative Amendment No 009-33964-00004, issued on January 24, 2014

Significant Permit Modification No.: 009-35102-00004	
Issued by: Tripurari Sinha Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 9, 2015 Expiration Date: September 5, 2018

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Certification
Emergency Occurrence Report
Part 70 Quarterly Reports
Quarterly Deviation and Compliance Monitoring Report

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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. 4, identified as C004, constructed in 2014, maximum capacity at 16 MMBtu/hour 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 888-010.

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/hour 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. 4, identified as C004, constructed in 2014, for volatile organic compound (VOC) control, exhausting to stack S/V 888-010;

(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. 4, identified as C004, constructed in 2014, for volatile organic compound (VOC) control, exhausting to stack S/V 888-010; 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. 4, identified as C004, constructed in 2014, for volatile organic compound (VOC) control, exhausting to stack S/V 888-010;

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 EU011, EU012, and EU013, 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 (C004 (Thermal oxidizer 002 was replaced in 2014 by thermal oxidizer C004)) 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. 4, identified as C004, constructed in 2014, maximum capacity at 16 MMBtu/hour 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 888-010.

(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. 4 (C004) 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]

Within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup of the thermal oxidizer, the Permittee shall conduct a performance test to determine VOC control efficiency for the thermal oxidizer C004 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 the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

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 [40 CFR 63, Subpart JJJJ]

(a) The capture system shall be monitored continuously and instrumentation shall be calibrated, maintained, and operated for measuring oven pressure (or another appropriate operating parameter selected by the Permittee). 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 document oven pressure (or alternative operating parameter) during the latest valid stack test that demonstrates compliance with limits in Condition D.1.2.

(c) The oven pressure (or alternative operating parameter) shall be maintained within the normal range identified in the Capture System Monitoring Plan. The Permittee shall record the 3-hour average oven pressure (or alternative operating parameter) while the capture system is used to demonstrate compliance with Condition D.1.2 and 40 CFR 63, Subpart JJJJ.

(d) The instruments used for determining oven pressure (or alternative operating parameter) 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 twelve (12) months.

(e) When, for any one reading, the 3-hr average, oven pressure (or alternative operating parameter) 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 from 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 oven pressure (or alternative operating parameter) records and document the 3-hour average reading during the latest valid stack test. The Permittee shall maintain the oven pressure (or alternative operating parameter) within the range of values identified in the Capture System Monitoring Plan.

(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/hour 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]

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 the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

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 [40 CFR 63, Subpart 63]

(a) The capture system shall be monitored continuously and instrumentation shall be calibrated, maintained, and operated for measuring oven pressure (or another appropriate operating parameter selected by the Permittee). 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 document the oven pressure (or alternative operating parameter) during the latest valid stack test that demonstrates compliance with limits in Condition D.2.1.

(c) The oven pressure (or alternative operating parameter) shall be maintained within the normal range identified in the Capture System Monitoring Plan. The Permittee shall record the 3-hour average oven pressure (or alternative operating parameter) while the capture system is used to demonstrate compliance with Condition D.2.2 and 40 CFR 63, Subpart JJJJ.

(d) The instruments used for determining the oven pressure (or alternative operating parameter) 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 twelve (12) months.

(e) When, for any one reading, the 3-hr average oven pressure (or alternative operating parameter) 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 from 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. 4, identified as C004, constructed in 2014, for volatile organic compound (VOC) control, exhausting to stack S/V 888-010;

(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. 4, identified as C004, constructed in 2014, for volatile organic compound (VOC) control, exhausting to stack S/V 888-010;

(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:

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

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 (14.31 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]

Within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup of the thermal oxidizer, 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 the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

D.3.6 VOC Emissions

Compliance with condition D.3.2 shall be demonstrated no later than 30 days from 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 [40 CFR 63, Subpart 63]

(a) Permanent total enclosures shall be monitored continuously and instrumentation shall be calibrated, maintained, and operated for measuring the enclosure pressure (or another operating parameter selected by the Permittee). 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 document the enclosure pressure (or alternative operating parameter) during the latest valid stack test that demonstrates compliance with limits in Condition D.3.1.

(c) The enclosure pressure (or alternative operating parameter) shall be maintained within the normal range identified in the Capture System Monitoring Plan. The Permittee shall record the 3-hour average enclosure pressure (or alternative operating parameter) while the capture system is used to demonstrate compliance with Condition D.3.1 and 40 CFR 63, Subpart JJJJ.

(d) The instruments used for determining the enclosure pressure (or alternative operating parameter) 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 twelve (12) months.

(e) When, for any one reading, the 3-hr average, enclosure pressure (or alternative operating parameter) 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 from 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 enclosure pressure (or alternative operating parameter) records and document the 3-hour average reading during the latest valid stack test. The Permittee shall maintain the enclosure pressure (or alternative operating parameter) within the range of values identified in the Capture System Monitoring Plan.

(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. 4, identified as C004, constructed in 2014, for volatile organic compound (VOC) control, exhausting to stack S/V 888-010;.

(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]

Within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup of the thermal oxidizer, the Permittee shall conduct a performance test to verify VOC control efficiency as required in condition D.4.1 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 the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

D.4.6 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated not later than 30 days from 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 [40 CFR 63, Subpart 63]

(a) Permanent total enclosures shall be monitored continuously and instrumentation shall be calibrated, maintained, and operated for measuring the enclosure pressure (or another operating parameter selected by the Permittee). 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 document enclosure pressure (or alternative operating parameter) during the latest valid stack test that demonstrates compliance with limits in Condition D.4.1.

(c) The enclosure pressure (or alternative operating parameter) shall be maintained within the normal range identified in the Capture System Monitoring Plan.

(d) The instruments used for determining the enclosure pressure (or alternative operating parameter) 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 twelve (12) months.

(e) When, for any one reading, the 3-hr average, enclosure pressure (or alternative operating parameter) 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.4.7, 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.4.8, the Permittee shall maintain continuous enclosure pressure (or alternative operating parameter) records and document the 3-hour average reading during the latest valid stack test. The Permittee shall maintain the enclosure pressure (or alternative operating parameter) within the range of values identified in the Capture System Monitoring Plan.

(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

(j) Die Cleaning Stations:

Three die cleaning stations identified as EU011, EU012, and EU013, each constructed in 1995 and used to solvent clean the coating die from EU 001, EU002 and EU003.

Insignificant Activities:

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

(The information describing the process contained in this 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 888-010. 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 888-010. 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 888-010. 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)]

(d) One (1) VCS Coating Line, identified as EU004, constructed in 1994 and 2007, exhausting to stack S/V 001-001 and stack S/V 888-010. 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)]

(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.

(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)]

Insignificant Activities

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

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

(g) 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 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: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Description and Location

Source Name:	**3M Hartford City**
Source Location:	**304S 075E, Hartford City, Indiana 47348**
County:	**Blackford**
SIC Code:	**2672, 2899, 3081**
Permit Renewal No.:	**T009-32463-00004**
Operation Permit Issuance Date:	**September 5, 2013**
Significant Permit Modification No.:	**009-35102-00004**
Permit Reviewer:	**Josiah Balogun**

Existing Approvals

The source was issued Part 70 Operating Permit No. 009-32463-00004 on September 5, 2013. The source has since received the following approvals:

(a) Administrative Amendment No. 009-33795-000004, issued on November 26, 2013; and

(b) Administrative Amendment No. 009-33964-000004, issued on January 24, 2014;

(c) Significant Permit Modification No. 009-34025-000004, issued on July 18, 2014.

County Attainment Status

The source is located in Blackford County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

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

Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Blackford County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Blackford County has been classified as attainment or unclassifiable in Indiana for list the pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	**Emissions** (ton/yr)
PM	< 250
PM_{10}	< 250
$PM_{2.5}$	< 250
SO_2	< 250
VOC	> 250
CO	< 250
NO_X	< 250
GHGs as CO_2e	< 100,000
HAPs	
Single HAP	> 10
Total HAPs	> 25

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) These emissions are based upon Part 70 Operating permit no. 009-32463-00004, issued on September 5, 2013.

(c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by 3M Hartford City on November 3, 2014. The purpose of this permit application is to revise the parametric parameters listed in the permit to accurately reflect the operating systems already installed and historically used at the plant. While the source is capable of monitoring the thermal oxidizer inlet duct pressure and fan amperage, the Permittee does not monitor those parameters to verify that the capture system is operating correctly. Instead the source monitors the oven pressure drop which is a superior monitoring parameter for these reasons list below;

Enforcement Issues

There are no pending enforcement actions.

Permit Level Determination – Part 70 Modification to an Existing Source

There is no increase in the potential to emit of any regulated pollutants associated with this modification. This modification is not subject to the source modification requirements under 326 IAC 2-7-10.5. The changes will be incorporated into the permit as a Significant Permit Modification under 326 IAC 2-7-12, because the modification involves significant changes to existing monitoring, reporting, and/or record keeping requirements.

Permit Level Determination – PSD

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

NSPS:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

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

State Rule Applicability Determination

326 IAC 2-2 PSD
PSD applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-7-6(5) (Annual Compliance Cerification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittee from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittee can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittee and Title V compliance certifications.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Control	Parameter	Frequency	Range/ Value	Excursions and Exceedances	Limit or Requirement
Thermal Oxidizer	oven pressure (or another appropriate operating parameter selected by the Permittee)	Continuous	Value to be determined from the last compliance stack test	Response steps	40 CFR 63, Subpart JJJJ

Lynne Sullivan and Steve friend of the Compliance Branch has certified the changes to the Parametric Monitoring based on the consistency with what the Compliance Monitoring requirements of 40 CFR 63, Subpart JJJJ.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 009-32463-00004. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Change 1: The fan amperage, oven pressure and TO inlet duct pressure cannot be varied by large enough range during a performance test to establish an acceptable range for future compliance demonstration. In order to establish a realistic operating range, the compliance test operating data would need to be supplemented with additional engineering data (such as engineering or that manufacture's recommendations). Thus, the permit requirement to establish a 3-hour average during the compliance test is not practical nor is it required by MACT JJJJ. Instead, the validity of the capture system operating parameters (i.e. oven pressure) can be verified during a test. The Permittee's average oven pressure does not provide a range for establishing a minimum or acceptable operating range, but does confirm that the capture system monitoring parameter is accurate and acceptable.

D.1.7 Parametric Monitoring **[40 CFR 63, Subpart JJJJ]**

(a) ~~A continuous~~ **The capture system shall be monitored continuously and** ~~monitoring system~~ **instrumentation** shall be calibrated, maintained, and operated ~~on the thermal oxidizer~~ for measuring ~~duct pressure or fan amperage~~ **oven pressure (or another appropriate operating parameter selected by the Permittee)**. 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~~ **document** ~~the 3-hour average duct pressure or fan amperage~~ **oven pressure (or alternative operating parameter) during** ~~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~~ **The oven pressure (or alternative operating parameter)** shall be maintained within the normal range **identified in the Capture System Monitoring Plan** ~~as established in the latest compliant stack test~~. **The Permittee shall record the 3-hour average oven pressure (or alternative operating parameter) while the capture system is used to demonstrate compliance with Condition D.1.2 and 40 CFR 63, Subpart JJJJ.**

(d) The instruments used for determining ~~the duct pressure or fan amperage~~ **oven pressure (or alternative operating parameter)** 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)~~ **twelve (12)** months.

(e) When, for any one reading, the 3-hr average ~~temperature~~, ~~the duct pressure or fan amperage~~ **oven pressure (or alternative operating parameter)** 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~~ **from** the end of each compliance period.

****

(c) To document the compliance status with Condition D.1.7, the Permittee shall maintain continuous ~~duct pressure or fan amperage~~ **oven pressure (or alternative operating parameter)** records ~~for the thermal oxidizer~~ and **document** the 3-hour average ~~duct pressure or fan amperage~~ **reading during** ~~used to demonstrate compliance during~~ the latest valid stack test. **The Permittee shall maintain the oven pressure (or alternative operating parameter) within the range of values identified in the Capture System Monitoring Plan.**

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

****

D.2.7 Parametric Monitoring **[40 CFR 63, Subpart JJJJ]**

(a) ~~A continuous~~ **The capture system shall be monitored continuously and** ~~monitoring system~~ **instrumentation** shall be calibrated, maintained, and operated ~~on the thermal oxidizer~~ for measuring ~~duct pressure or fan amperage~~ **oven pressure (or another appropriate operating parameter selected by the Permittee)**. 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~~ **document** the ~~3-hour average duct pressure or fan amperage~~ **oven pressure (or alternative operating parameter) during** ~~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~~ **The oven pressure (or alternative operating parameter)** shall be maintained within the normal range **identified in the Capture System Monitoring Plan** ~~as established in the latest compliant stack test~~. **The Permittee shall record the 3-hour average oven pressure (or alternative operating parameter) while the capture system is used to demonstrate compliance with Condition D.2.2 and 40 CFR 63, Subpart JJJJ.**

(d) The instruments used for determining the ~~duct pressure or fan amperage~~ **oven pressure (or alternative operating parameter)** 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)~~ **twelve (12)** months.

(e) When, for any one reading, the 3-hr average ~~temperature, the duct pressure or fan amperage~~ **oven pressure (or alternative operating parameter)** 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.

****

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~~ **from** the end of each compliance period.

****

D.3.6 VOC Emissions

Compliance with condition D.3.2 shall be demonstrated no later than 30 days ~~of~~ **from** 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:

****

D.3.8 Parametric Monitoring **[40 CFR 63, Subpart JJJJ]**

(a) ~~A continuous~~ **Permanent total enclosures shall be monitored continuously and instrumentation** ~~monitoring system~~ shall be calibrated, maintained, and operated ~~on the thermal oxidizer~~ for measuring **the enclosure** ~~duct~~ pressure ~~or fan amperage~~ **(or another operating parameter selected by the Permittee)**. 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~~ **document** the ~~3-hour average duct~~ **enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** ~~from~~ **during** 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~~ **The enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** shall be maintained within the normal range **identified in the Capture System Monitoring Plan** ~~as established in the latest compliant stack test~~. **The Permittee shall record the 3-hour average enclosure pressure (or alternative operating parameter) while the capture system is used to demonstrate compliance with Condition D.3.1 (or D.4.1) and 40 CFR 63, Subpart JJJJ.**

(d) The instruments used for determining the ~~duct~~ **enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** 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)~~ **twelve (12)** months.

(e) When, for any one reading, the 3-hr average ~~temperature~~, ~~the~~ ~~duct~~ **enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** 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~~ **from** the end of each compliance period.

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(c) To document the compliance status with Condition D.3.8, the Permittee shall maintain continuous ~~duct~~ **enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** records ~~for the thermal oxidizer~~ and **document** the 3-hour average ~~duct pressure or fan amperage~~ **reading during** ~~used to demonstrate compliance during~~ the latest valid stack test. **The Permittee shall maintain the enclosure pressure (or alternative operating parameter) within the range of values identified in the Capture System Monitoring Plan.**

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

****

D.4.6 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated not later than 30 days ~~of~~ **from** 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:
****

D.4.8 Parametric Monitoring **[40 CFR 63, Subpart JJJJ]**

(a) ~~A continuous monitoring system~~ **Permanent total enclosures shall be monitored continuously and instrumentation** shall be calibrated, maintained, and operated ~~on the thermal oxidizer~~ for measuring **the** ~~duct~~ **enclosure** pressure ~~or fan amperage~~ **(or another operating parameter selected by the Permittee)**. 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~~ **document** ~~the 3-hour average duct~~ **enclosure** pressure ~~or fan amperage from~~ **(or alternative operating parameter) during** 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~~ **The enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** shall be maintained within the normal range **identified in the Capture System Monitoring Plan** ~~as established in the latest compliant stack test~~.

(d) The instruments used for determining the ~~duct~~ **enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** 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)~~ **twelve (12)** months.

(e) When, for any one reading, the 3-hr average ~~temperature~~, ~~the~~ ~~duct~~ **enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** 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

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(b) To document the compliance status with Condition **D.4.7** ~~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.4.8** ~~D.3.8~~, the Permittee shall maintain continuous ~~duct~~ **enclosure** pressure ~~or fan amperage~~ **(or alternative operating parameter)** records ~~for the thermal oxidizer~~ and **document** the 3-hour average ~~duct pressure or fan amperage~~ **reading during** ~~used to demonstrate compliance during~~ the latest valid stack test. **The Permittee shall maintain the enclosure pressure (or alternative operating parameter) within the range of values identified in the Capture System Monitoring Plan.**

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

Conclusion and Recommendation

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 009-35102-00004. The staff recommends to the Commissioner that this Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Josiah Balogun at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5257 or toll free at 1-800-451-6027 extension 4-5257.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

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

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

TO: Russ Edmonds
3M Hartford City
0304 S 075 E
Hartford City, IN 47348

DATE: February 9, 2015

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

SUBJECT: Final Decision
Title V Significant Permit Modification
009-35102-00004

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
Jen Moore, 3M Company
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	VHAUN 2/9/2015 3M - Hartford City 009-35102-00004 FINAL			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Russ Edmonds 3M - Hartford City 0304S-075E Hartford City IN 47348 (Source CAATS) VIA CERTIFIED MAIL USPS									
2		Scott Pretzsch Plant Mgr 3M - Hartford City 0304S-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		Mr. Hartford City Public Library 314 N High St Hartford City IN 47348 *(Library)*									
8		Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 *(Affected Party)*									
9		Mr. Dan Baughey 103 Lakeview Drive Hartford City IN 47348 *(Affected Party)*									
10		Jen Moore 3M Company 3M Center Building 224-5W-03 St. Paul MN 55144 *(Source – addl contact)*									
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