



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties  
Date: July 9, 2015  
From: Matthew Stuckey, Chief  
Permits Branch  
Office of Air Quality  
Source Name: Daramic LLC  
Permit Level: Title V Operating  
Permit Number: 061-35655-00012  
Source Location: 3430 Cline Road NW  
Type of Action Taken: Permit Renewal

## 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 35655.

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

*(continues on next page)*

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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Commissioner

Mr. Brian Thompson  
Daramic, LLC  
3430 Cline Road NW  
Corydon, IN 47112-6908

July 9, 2015

Re: 061-35655-00012  
Significant Permit Modification to  
Part 70 Renewal No.: T061-31760-00012

Dear Mr. Thompson:

Daramic, LLC was issued Part 70 Operating Permit No. T061-31760-00012 on July 10, 2014 for a stationary battery separator manufacturing plant located at 3430 Cline Road, Corydon, IN 47112. An application requesting changes to this permit was received on March 12, 2015. Pursuant to the provisions of 326 IAC 2-7-12(d), 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 the 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 EEEE - National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)

ATTACHMENT B - 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters Requirements

ATTACHMENT C - 40 CFR 60, Subpart Dc - New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units

ATTACHMENT D - 40 CFR 60, Subpart IIII - New Source Performance Standards (NSPS) for Stationary Compression Ignition 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](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 Aida DeGuzman, of my staff, at 317-233-4972 or 1-800-451-6027, and ask for extension 3-4972.

Sincerely,

A handwritten signature in black ink, appearing to read "CAW", followed by the text "For:".

Chrystal A. Wagner, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit, Technical Support Document

CAW/APD

cc: File - Harrison County  
Harrison County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Daramic, LLC  
3430 Cline Road NW  
Corydon, Indiana 47112**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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 approval 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.: T061-31760-00012	
Issued by/Original Signed by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 10, 2014  Expiration Date: July 10, 2019
Minor Permit Modification No.: 061-35452-00012, issued on April 22, 2015	
Significant Permit Modification No.:061-35655-00012	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 9, 2015  Expiration Date: July 10, 2019

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary battery separator manufacturing plant.

Source Address:	3430 Cline Road NW, Corydon, Indiana 47112
General Source Phone Number:	(812) 738-0422
SIC Code:	3089
County Location:	Harrison County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 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)]

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This stationary source consists of the following emission units and pollution control devices used in the production of plastic battery separator at a maximum production rate of 100 million square meters per year (Mm<sup>2</sup>/yr):

- (a) Sub-Micro (SM) Line 3, installed in 1979, and Sub-Micro (SM) Line 4, installed in 1984, consisting of the following equipment:
  - (1) Four (4) silos, identified as Unit ID #s 4.1-4.4, used to store either polyethylene or silica, with a maximum storage capacity of 168, 168, 75, and 75 tons, respectively, and maximum throughput rate of 10, 10, 7.5, 7.5 tons per hour, respectively, utilizing a bin filter (Unit ID #s 4.1-4.4) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 4, 5, 6, and 7, respectively;
  - (2) Two (2) day bins, identified as Unit ID #s 6.1 and 6.2, used to store silica and polyethylene, respectively, with a maximum storage capacity of 2.4 and 0.125 tons, respectively, each utilizing a bin filter (Unit ID #s 6.1 and 6.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 10 and 11, respectively;
  - (3) One (1) silo dilute phase transporter, identified as Unit ID #3.1, constructed in 2008, used to convey silica from rail cars to silo #s 4.2-4.5, with a maximum throughput rate of 5.25 tons per hour, utilizing a baghouse (Unit ID # 3.1) for particulate control, exhausting through one (1) stack, identified as S/V ID #3;
  - (4) One (1) silica transporter, identified as Unit ID # 5.1, constructed in 1979, used to convey silica from silos 4.3, 4.4, and 4.5 to silica day bin # 6.1, utilizing a baghouse (Unit # 5.1) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID # 9;

- (5) Two (2) oil extraction systems, identified as Unit ID #s 9.1 and 9.2, each system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing a carbon adsorber to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 17;
  - (6) One (1) extruder, identified as Unit ID #8.1, controlled by a precipitative coalescing filter (smog hog) and exhausting through one (1) stack identified as S/V ID #14;
  - (7) One (1) extruder, identified as Unit ID #8.2, controlled by a precipitative coalescing filter (smog hog) and exhausting through one (1) stack identified as S/V ID #16;
  - (8) Two (2) aerosol addition systems (mix towers), identified as Unit ID #s 10.1, 10.2, exhausting inside the building;
- (b) Sub-Micro (SM) Line 6, installed in 1991, consisting of the following equipment:
- (1) One (1) silo, identified as Unit ID # 4.5, used to store silica, with a maximum storage capacity of 75 tons, with a maximum throughput rate of 7.5 tons per hour, utilizing a bin filter (Unit ID # 4.5) for particulate matter control, exhausting through one (1) stack, identified as S/V ID # 8;
  - (2) Two (2) day bins, identified as Unit ID #s 7.1 and 7.2, used to store silica and polyethylene, respectively, each with a maximum storage capacity of 2.4 and 0.125 tons, respectively, and maximum throughput rate of 800.32 pounds per hour and 307.65 pounds per hour, respectively, each utilizing a bin filter (Unit ID #s 7.1 and 7.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 12 and 13, respectively;
  - (3) One (1) oil extraction system, identified as Unit ID # 9.3, system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing a carbon adsorber to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 17;
  - (4) One (1) extruder, identified as Unit ID # 8.3, controlled by a precipitative coalescing filter (smog hog) and exhausting through one (1) stack identified as S/V ID #16;
  - (5) One (1) aerosol addition system (mix tower), identified as Unit ID # 10.3, exhausting inside the building;
- (c) Sub-Micro (SM) Lines 3, 4 and 6 support equipment, consisting of storage tanks (Unit ID #s 11.1 through 11.6) and a trichloroethylene (TCE) recovery system (smokehouse) Unit ID #9.4;
- Under NESHAP Subpart EEEE, storage tanks (Unit ID #s 11.1 through 11.6) are considered existing affected sources.
- (d) One (1) boiler, identified as Unit ID # 1.1, constructed in 1979, with a maximum heat input capacity of 12.553 MMBtu per hour, combusting natural gas or No. 2 fuel oil, exhausting through one (1) stack, identified as S/V ID # 1;
  - (e) One (1) natural gas-fired boiler (500 HP), identified as Unit ID # 2.1-2, installed in 2011, with a maximum heat input capacity of 20.94 MMBtu per hour, exhausting through one (1)

stack, identified as S/V ID # 2. Under 40 CFR 60, Subpart Dc, this is an affected Small Industrial-Commercial-Institutional Steam Generating Unit.

- (f) One (1) tank, identified as Unit # 11.7, constructed in 1991, used to store virgin oil, with a maximum storage capacity of 14,384 gallons;
- (g) One (1) silo dilute phase transporter, identified as Unit ID #13, installed in 2000, used to convey polyethylene pneumatically from rail cars to a silo, with a maximum throughput rate of 10 tons per hour, utilizing a bin filter for particulate control and exhausting through one (1) stack, identified as S/V ID #20;
- (h) One (1) polyethylene day bin line 3 with maximum throughput rate of 226.47pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F05.1;
- (i) One (1) silica day bin line 3 with maximum throughput rate of 588.96 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F01.1;
- (j) One (1) polyethylene day bin line 4 with maximum throughput rate of 241.99 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F05.2; and
- (k) One (1) silica day bin line 4 with maximum throughput rate of 629.34 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F01.2.
- (l) One (1) Oil Conditioner, identified as ID No. 20.1, with a maximum flow rate capacity of 16.67 gallons of oil per minute (gpm), VOC and HAP emissions controlled by the existing carbon adsorption system (CAS) exhausting to Stack No. 17, approved in 2015 for construction.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour:
  - (1) Natural gas-fired space heaters.
- (b) Propane or liquefied petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
  - (1) Propane and oil surge tanks.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (one 80-gallon part washer installed in 2010 that replaced a similar capacity unit).
- (d) Wastewater treatment system.
- (e) Forced and induced draft cooling tower system not regulated under a NESHAP, reusing treated wastewater and tap water as make-up water.

- (f) Replacement or repair of filters in air filtration equipment.
- (g) Heat exchanger cleaning and repair.
- (h) Trimmers that do not produce fugitive emissions and that are equipped with a dust collector or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2].
- (i) Paved and unpaved roads with public access [326 IAC 6-4].
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) Blowdown for the following: compressor, pumps and cooling tower.
- (l) On-site fire and emergency response training approved by the department.
- (m) Stationary fire pumps- one 334 HP diesel fire pump installed in 2013.
- (n) Filter or coalescer media changeout.
- (o) A laboratory as defined by 326 IAC 2-7-1(21)(H).
- (p) Other activities or categories with VOC emissions less than the insignificant thresholds, not previously identified:
  - (1) SM Line 3 mixing tower, SM Line 4 mixing tower
  - (2) SM Line 6 mixing tower;
- (q) One (1) Chop Line: The line utilizes separator material made by the Corydon plant and purchased fiberglass in roll form. The 50-inch wide fiberglass is applied in roll form onto the separator material. Glue is used as an adhesive to bond the fiberglass to the separator material. The roll is heated in an electrically powered oven. The sheet exits the oven to a conveyor belt where it is cut into customer-required dimensions. An exhaust blower is used as a ventilation system directing fiberglass particles to a cyclone and collection bin and venting inside the building. The fiberglass is disposed as plant waste to a local landfill. Based on maximum usage of glue, the potential to emit VOC is less than 100 pounds per year [326 IAC 6-3-2].
- (r) Defect marking operation.

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

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

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

## SECTION B

## GENERAL CONDITIONS

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

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

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

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- (a) This permit, T061-31760-00012, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by the 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 5  
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 (PMP) 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.

- (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).

- (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 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) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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- (a) All terms and conditions of permits established prior to T061-31760-00012 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)]**

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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]**

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- (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)]

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- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5  
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) or (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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- (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 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work

or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

### C.7 Performance Testing [326 IAC 3-6]

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- (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) For testing required by this permit or other applicable requirements, the Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

### C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)] [40 CFR 64][326 IAC 3-8]

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- (a) 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 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 initial start-up, 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.

- (b) For monitoring required by 326 IAC 3-8 (CAM), at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this 40 CFR Part 64 including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The Permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

**C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6] [40 CFR 64][326 IAC 3-8]

- (a) Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation not subject to CAM in this permit:
  - (1) 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.
  - (2) The response shall include minimizing the period of any start-up, shutdown, or malfunction. The response may include, but is not limited to, the following:
    - (i) initial inspection and evaluation;
    - (ii) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
    - (iii) any necessary follow-up actions to return operation to normal or usual manner of operation.
  - (3) 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:
    - (i) monitoring results;
    - (ii) review of operation and maintenance procedures and records; and/or
    - (iii) inspection of the control device, associated capture system, and the process.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.

- (5) The Permittee shall record the reasonable response steps taken.
- (b)
- (1) CAM Response to excursions or exceedances.
    - (i) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
    - (ii) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
  - (2) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
  - (3) Based on the results of a determination made under paragraph (b)(1)(ii) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a quality improvement plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
  - (4) Elements of a QIP:  
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
  - (5) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

- (6) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (b)(1)(ii) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
- (i) Failed to address the cause of the control device performance problems; or
  - (ii) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (7) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [40 CFR 64] [326 IAC 2-2] [326 IAC 2-3]

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- (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:
- (1) All calibration and maintenance records.
  - (2) All original strip chart recordings for continuous monitoring instrumentation.
  - (3) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

- (1) The date, place, as defined in this permit, and time of sampling or measurements.
- (2) The dates analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of such analyses.
- (6) 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) CAM recordkeeping requirements.
- (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section C.13(b)(3) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
  - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements
- (d) 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(o) 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.
- (e) 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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 3-8] [326 IAC 2-2] [326 IAC 2-3]

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- (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 no later than thirty (30) days of 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.

The Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the QIP has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (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 (e) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2 -2 -1 (oo) and/or 326 IAC 2 -3 -1 (jj)) *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 (d)(1) in Section C - General Record Keeping Requirements exceed the baseline actual

emissions, as documented and maintained under Section C - General Record Keeping Requirements (d)(1)(C)(i), by a significant amount, as defined in 326 IAC 2 -2 -1 (ww) and/or 326 IAC 2 -3 -1 (pp), 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 (d)(1)(C)(ii).
- (f) The report for a 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 (e)(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.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]

- (a) Sub-Micro (SM) Line 3, installed in 1979, and Sub-Micro (SM) Line 4, installed in 1984, consisting of the following equipment:
- (1) Two (2) oil extraction systems, identified as Unit ID #s 9.1 and 9.2, each system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing a carbon adsorber to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 17;
  - (2) One (1) extruder, identified as Unit ID #8.1, controlled by a precipitative coalescing filter (smog hog) and exhausting through one (1) stack identified as S/V ID #14;
  - (3) One (1) extruder, identified as Unit ID #8.2, controlled by a precipitative coalescing filter (smog hog) and exhausting through one (1) stack identified as S/V ID #16;
  - (4) Two (2) aerosol addition systems (mix towers), identified as Unit ID #s 10.1, 10.2, exhausting inside the building;
- (b) Sub-Micro (SM) Line 6, installed in 1991, consisting of the following equipment:
- (1) One (1) oil extraction system, identified as Unit ID # 9.3, system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing a carbon adsorber to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 17;
  - (2) One (1) extruder, identified as Unit ID # 8.3, controlled by a precipitative coalescing filter (smog hog) and exhausting through one (1) stack identified as S/V ID #16;
  - (3) One (1) aerosol addition system (mix tower), identified as Unit ID # 10.3, exhausting inside the building;
- (c) Sub-Micro (SM) Lines 3, 4 and 6 support equipment, consisting of storage tanks (Unit ID #s 11.1 through 11.6) and a trichloroethylene (TCE) recovery system (smokehouse) Unit ID # 9.4.
- (l) One (1) Oil Conditioner, identified as ID No. 20.1, with a maximum flow rate capacity of 16.67 gallons of oil per minute (gpm), VOC and HAP emissions controlled by the existing carbon adsorption system (CAS) exhausting to Stack No. 17, approved in 2015 for construction.

(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 General Reduction Requirements - BACT [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 8-1-6, the Permittee shall comply with the following BACT requirements:
- (1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, Sub-Micro (SM) Line 4 and Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and

- the recovery system (smokehouse, Unit ID # 9.4) shall be controlled by a Carbon Adsorption System (CAS) with an overall control efficiency of no less than 96%.
- (2) The VOC emissions from the CAS stack (S/V ID # 17) shall not exceed 46.2 pounds per hour.
  - (3) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.
- (b) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4) when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the CAS but the control efficiency of 96% shall not apply due to the expected low VOC inlet concentration.
- (c) The control efficiency of 96% shall not apply when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID #11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.
- (d) The implementation of a leak detection and repair (LDAR) program for equipment leaks as follows:
- (1) The Permittee shall develop a written LDAR program requiring leak checks of all equipment in trichloroethylene service.
  - (2) The LDAR program shall include the following elements:
    - (A) Written LDAR program - The written LDAR program shall specify the source's specific procedure for recordkeeping, certifications, monitoring and repair
    - (B) Training - The training programs can vary according to the level of involvement and degree of responsibility of LDAR personnel.
    - (C) LDAR audits - The audits shall check that the correct equipment is being monitored, LDAR program procedures are being followed, leaks are being fixed and the required records are being kept.
    - (D) Contractor accountability - The LDAR program shall describe oversight procedures to increase the accountability of contractors.
    - (E) Internal leak definition - The LDAR program shall include the internal leak definition applicable to equipment in TCE service
    - (F) More frequent monitoring - To ensure that leaks are still being identified in a timely manner and that previously unidentified leaks are not worsening over time, implement a plan for more frequent monitoring for components that contribute most to equipment leak emissions.
    - (G) First attempt at repair - Time frames and practices must be established for first attempt at repairing components to stop detected leaks while still small.
    - (H) Delay of repair compliance assurance - Any component that cannot be repaired during the specified repair interval must be placed on a "Delay of Repair" list to be repaired during the next shutdown cycle. Delay of repair compliance assurance procedures are to be included to ensure that the appropriate

equipment is justifiably on the "Delay of Repair" list.

- (I) Electronic monitoring and storage of data - Maintenance of an electronic database for storing and reporting LDAR data and use of data loggers or other data collection devices during all LDAR monitoring.
- (J) QA/QC of LDAR data - A procedure to ensure QA/QC review of all data generated by LDAR monitoring.
- (K) Calibration drift assessment - Calibration of LDAR monitoring equipment using an appropriate calibration gas, in accordance with 40 CFR Part 60, EPA Reference Test Method 21.
- (L) Records of maintenance - Records must be maintained for the LDAR program in accordance with Section C - General Record Keeping Requirements.

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

#### D.1.3 Operation of VOC Controls

- (a) The Carbon Adsorption System (CAS) shall be in operation at all times and control emissions from the oil extraction systems for SM Lines - 3, 4 and 6, storage tanks, IDs 11.1 through 11.6, the trichloroethylene recovery system (Smokehouse, Unit ID # 9.4) and the oil conditioner, ID No. 20.1.
- (b) When the oil extraction systems for SM Lines 3, 4 and 6 are in operation, one (1) of the two (2) carbon beds shall be regenerated at least once every ninety (90) minutes, while one (1) carbon bed is operating.

#### D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within five (5) years from the most recent compliance stack test, the Permittee shall perform VOC testing of the carbon adsorption system (CAS) to demonstrate compliance with Condition D.1.1(a)(1) and (2), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

### **Compliance Monitoring Requirements**

#### D.1.5 Carbon Adsorption System Monitoring [40 CFR Part 64] [326 IAC 3-8]

Pursuant to 326 IAC 3-8 (CAM), and to ensure compliance with Conditions D.1.1(a) and proper operation of the carbon adsorber, the following compliance monitoring is required:

- (a) The Permittee shall certify and maintain a continuous VOC monitoring system within 180 days of permit issuance.
- (b) The continuous VOC monitoring system shall be calibrated and operated to measure the control efficiency of the carbon adsorber system (CAS) serving oil extraction systems for SM-3, SM-4 and SM-6. The continuous VOC monitoring system shall be in operation at all times the oil extraction systems for Lines SM-4 or SM-6 are in operation, except during

periods the monitoring system is undergoing quality assurance/quality control checks, repairs, replacement or maintenance or is malfunctioning. "Continuous" shall mean the collection of at least one measurement of CAS inlet and CAS outlet VOC concentrations for each 15-minute block period. Compliance is indicated if the 24-hour average CAS control efficiency is no less than 96%.

- (c) Relative Accuracy Test Audits (RATAs) must be performed on the monitoring system no less than once every 5 years.
- (d) Zero and Span calibrations shall be performed no less frequently than once per week. According to the procedures of 40 CFR Part 60 Appendix F Section 4.0, any reading in excess of 2.5% of span would require immediate corrective action, any reading greater than 10% of span would be considered out of control.
- (e) The Permittee shall respond to monitor out of control periods as defined in 40 CFR Part 60, Appendix F, Section 4.3.1.
- (f) Quarterly Cylinder Gas Audits shall be performed in any quarter where a RATA is not conducted.
- (g) If the continuous VOC monitoring system is down for more than 5 days, the Permittee shall take daily instantaneous measurements of the outlet VOC concentration of the CAS (using a handheld flame ionization detector, photo-ionization detector or comparable device) and at the same time record the value of the CAS exhaust gas flow rate. Provided the CAS exhaust gas flow rate is less than or equal to 5,652 standard cubic feet per minute (scfm), compliance is indicated if the CAS outlet VOC concentration is less than 400 ppmv , and no measurement of the CAS inlet VOC concentration or calculation of CAS efficiency is required for that day. If the outlet CAS VOC concentration is greater than 400 ppmv, then a daily grab measurement of the CAS inlet VOC concentration (using a colorimetric tube analysis) shall also be taken and the CAS control efficiency calculated to provide an indication of compliance. CAS control efficiency shall be calculated using the VOC concentration data as follows:

$$\text{CAS Efficiency (\%)} = \left[ \frac{\text{CAS}_{\text{inlet}} - \text{CAS}_{\text{outlet}}}{\text{CAS}_{\text{inlet}}} \right] \times 100$$

Daily measurements of CAS exhaust gas flow rate and VOC inlet and outlet concentrations shall be taken within the final 30 minutes of a carbon bed cycle and shall be taken when the CAS cooling air blower is not operating. The CAS cooling air blower is not operating when the measured CAS exhaust gas flow rate is less than or equal to 5,652 scfm. In the event that the outlet VOC concentration is greater than 400 ppmv and the CAS efficiency is less than 96%, the Permittee shall perform reasonable response steps to achieve 96% CAS efficiency. During continuous VOC monitoring system downtime, the Permittee shall continue to make daily CAS efficiency calculations until a CAS efficiency of 96% or more is achieved for seven (7) consecutive operating days. Upon achieving a daily CAS efficiency of 96% or more for seven (7) consecutive operating days, the Permittee may resume daily measurement of the outlet VOC concentration during continuous VOC monitoring system downtime.

#### D.1.6 Carbon Adsorption Failure Detection [40 CFR Part 64] [326 IAC 3-8]

In the event that carbon adsorber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). 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.

Compliance with the above monitoring condition shall also satisfy the requirements of 326 IAC 3-8, Compliance Assurance Monitoring, for the oil extraction systems for SM-3, SM-4, and SM-6.

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

### **D.1.7 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1(a) and D.1.5, the Permittee shall maintain records in accordance with (1) through (6). Records of all data and operating parameters shall be complete and sufficient to establish compliance with the limits established in Condition D.1.1(a) and the monitoring conditions established in Condition D.1.5.
- (1) Permittee shall maintain records of the readings of the continuous VOC monitoring system.
  - (2) All corrective and preventive actions taken.
  - (3) All maintenance logs, calibration checks, and other required quality assurance activities.
  - (4) A log of plant operations, including emission unit or monitoring system downtime with the following information:
    - (A) Date of emissions unit or monitoring system downtime.
    - (B) Time of commencement and completion of each downtime.
    - (C) Reason for each downtime.
    - (D) Nature of system repairs and adjustments
  - (5) Records of carbon bed desorptions/regenerations which shall include date and time of desorption.
  - (6) Records of once daily vapor leak checks of the vapor collection system downstream of the solvent-laden air (SLA) blower on the CAS and response steps taken if any. A leak is defined as greater than or equal to 10,000 ppmv, as methane.
- (b) To document the compliance status with Condition D.1.1(d), the Permittee shall maintain the records required by the written LDAR program.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

### **D.1.8 Reporting Requirements**

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A semi-annual report shall be submitted no later than thirty (30) days after the end of the semi-annual period being reported. The report shall contain a monthly summary of the readings from the continuous VOC monitoring system to document the compliance status with Conditions D.1.1(a) and D.1.5. The report shall include the following information:

- (1) 24-hour average or daily average CAS control efficiency readings less than 96% and date of such readings.
- (2) Continuous VOC monitoring system instrument downtime, except for zero (0) and span checks, shall include the following:

- (A) Date of downtime.
  - (B) Time of commencement.
  - (C) Duration of each downtime.
  - (D) Reasons for each downtime.
  - (E) Nature of system repairs and adjustments.
- (3) A notation and a reason for a lack of readings from the continuous VOC monitoring system (e.g., the process did not operate that day).
- (4) If there are no excess emissions or continuous VOC monitoring instrument downtime in a reporting period, the Permittee shall submit a report indicating that no excess emissions or downtime incidents occurred in the reporting period.
- (5) The semi-annual report shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit.

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

### Facility Description [326 IAC 2-7-5(14)]

- (a) Sub-Micro (SM) Line 3, installed in 1979, and Sub-Micro (SM) Line 4, installed in 1984, consisting of the following equipment:
- (1) Four (4) silos, identified as Unit ID #s 4.1-4.4, used to store either polyethylene or silica, with a maximum storage capacity of 168, 168, 75, and 75 tons, respectively, and maximum throughput rate of 10, 10, 7.5, 7.5 tons per hour, respectively, utilizing a bin filter (Unit ID #s 4.1-4.4) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 4, 5, 6, and 7, respectively;
  - (2) Two (2) day bins, identified as Unit ID #s 6.1 and 6.2, used to store silica and polyethylene, respectively, with a maximum storage capacity of 2.4 and 0.125 tons, respectively, each utilizing a bin filter (Unit ID #s 6.1 and 6.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 10 and 11, respectively;
  - (3) One (1) silo dilute phase transporter, identified as Unit ID #3.1, constructed in 2008, used to convey silica from rail cars to silo #s 4.2-4.5, with a maximum throughput rate of 5.25 tons per hour utilizing a baghouse (Unit ID # 3.1) for particulate control, exhausting through one (1) stack, identified as S/V ID # 3;
  - (4) One (1) silica transporter, identified as Unit ID # 5.1, constructed in 1979, used to convey silica from silos 4.3, 4.4, and 4.5 to silica day bin #s 6.1 and 6.2, utilizing a baghouse (Unit # 5.1) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID # 9;
- (b) Sub-Micro (SM) Line 6, installed in 1991, consists of the following equipment:
- (1) One (1) silo, identified as Unit ID # 4.5, used to store silica, with a maximum storage capacity of 75 tons, with a maximum throughput rate of 7.5 tons per hour, utilizing a bin filter (Unit ID # 4.5) for particulate matter control, exhausting through one (1) stack, identified as S/V ID # 8;
  - (2) Two (2) day bins, identified as Unit ID #s 7.1 and 7.2, used to store silica and polyethylene, respectively, with a maximum storage capacity of 2.4 and 0.125 tons, respectively, and maximum throughput rate of 800.32 and 307.65 pounds per hour, respectively, each utilizing a bin filter (Unit ID #s 7.1 and 7.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 12 and 13, respectively.
- (g) One (1) silo dilute phase transporter, identified as Unit ID #13, installed in 2000, used to convey polyethylene pneumatically from rail cars to a silo, with a maximum throughput rate of 10 tons per hour, utilizing a bin filter for particulate control and exhausting through one (1) stack, identified as S/V ID #20.
- (h) One (1) polyethylene day bin line 3 with maximum throughput rate of 226.47 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F05.1;
- (i) One (1) silica day bin line 3 with maximum throughput rate of 588.96 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F01.1;

- (j) One (1) polyethylene day bin line 4 with maximum throughput rate of 241.99 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F05.2; and
  - (k) One (1) silica day bin line 4 with maximum throughput rate of 629.34 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F01.2.
- (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.2.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the following operations shall not exceed the pound per hour limit listed in the table below:

Process/Facility	Process Weight Rate (tons/hr)	Particulate Emissions Limit (lbs/hr)
SM 3/4 Silo 01 (Unit ID # 4.1)	10.0	19.18
SM 3/4 Silo 02 (Unit ID # 4.2)	10.0	19.18
SM 3/4 Silo 03 (Unit ID # 4.3)	7.5	15.82
SM 3/4 Silo 04 (Unit ID # 4.4)	7.5	15.82
SM 6 Silo 05 (Unit ID # 4.5)	7.5	15.82
Silica Unload System (Unit ID # 3.1)	5.25	12.45
SM 6 Silica Day Bin (Unit ID # 7.1)	0.4002	2.22
SM 6 PE Day Bin (Unit ID # 7.2)	0.1538	1.17
SM 3/4 Day Bin (Unit ID # 6.1)	0.75	3.38
SM 3/4 Day Bin (Unit ID # 6.2)	0.75	3.38
SM 3/4 Silica Transporter (Unit ID # 5.1)	0.75	3.38
Silo Dilute Phase Transporter (Unit ID # 13)	10	19.18
Polyethylene day bin line 3 (F05.1)	0.1132	0.95
Silica day bin line 3 (F01.1)	0.2945	1.81
Polyethylene day bin line 4 (F05.2)	0.1210	1.0
Silica day bin line 4 (F01.2)	0.3147	1.89

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
 P = process weight rate in tons per hour

**D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

A Preventive Maintenance Plan is required for this facility and its control device. 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.2.3 Particulate Control

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- (a) The bin filters for the five (5) silos (ID #s 4.1 - 4.5) and four (4) day bins (ID #s 6.1, 6.2, 7.1 and 7.2), the baghouses for the three (3) transporters (Unit ID #s 3.1, 5.1 and 13), and the baghouses for the polyethylene and silica weigh bin lines 3 and 4 (F05.1, F01.1, F05.2 and F01.2), for particulate control shall be in operation at all times when the units are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

### D.2.4 Visible Emissions Notations

---

- (a) Daily visible emission notations of the five (5) silos (ID #s 4.1 - 4.5), four (4) day bins (ID #s 6.1, 6.2, 7.1 and 7.2), three (3) transporters (ID #s 3.1, 5.1 and 13) and polyethelene and silica weigh bin lines 3 and 4 (F05.1, F01.1, F05.2 and F01.2) stack exhausts shall be performed once per day during normal daylight operations. 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.

### D.2.5 Parametric Monitoring

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The Permittee shall record the pressure drop across the bin filters and baghouses used in conjunction with the five (5) silos (ID #s 4.1 - 4.5), four (4) day bins (ID #s 6.1, 6.2, 7.1 and 7.2), three (3) transporters (ID #s 3.1, 5.1 and 13) and polyethelene and silica weigh bin lines 3 and 4 (F05.1, F01.1, F05.2 and F01.2) at least once per day when any of the five (5) silos, four (4) day bins, three (3) transporters, and polyethelene and silica weigh bin lines 3 and 4 (F05.1, F01.1, F05.2 and F01.2) are in operation. When for any one (1) reading, the pressure drop across the bin filters and baghouses is outside the normal range, the Permittee shall take reasonable response steps. The normal range for these units is a pressure drop between 1.0 and 7.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

#### D.2.6 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse or bin filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse or bin filter controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag or filter failure can be indicated by a significant drop in the baghouse's or bin filter's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### D.2.7 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the five (5) silos, four (4) day bins, three (3) transporters and polyethelene and silica weigh bin lines 3 and 4 (F05.1, F01.1, F05.2 and F01.2) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(14)]

- (d) One (1) boiler, identified as Unit ID # 1.1, constructed in 1979, with a maximum heat input capacity of 12.553 MMBtu per hour, combusting natural gas or No. 2 fuel oil, exhausting through one (1) stack, identified as S/V ID # 1.

(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 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (e) (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the 12.553 MMBtu per hour heat input boiler (Unit ID # 1.1) shall be limited to 0.6 pounds per MMBtu heat input.

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

##### D.3.2 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler (Unit ID # 1.1) stack exhaust shall be performed during normal daylight operations when burning No. 2 fuel 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.3.3 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.2, the Permittee shall maintain records of daily visible emission notations of the boiler (Unit ID # 1.1) stack exhaust when burning No. 2 fuel oil. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]

- (e) One (1) natural gas-fired boiler (500 HP), identified as Unit ID # 2.1-2, installed in 2011, with a maximum heat input capacity of 20.94 MMBtu per hour, exhausting through one (1) stack, identified as S/V ID # 2. Under 40 CFR 60, Subpart Dc, this is an affected Small Industrial-Commercial-Institutional Steam Generating Unit.

(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 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 20.94 MMBtu per hour boiler shall be limited to 0.44 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

Q = Total source maximum operating capacity rating in MMBtu per hour.

#### D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

## SECTION D.5

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)] - Insignificant Activity

- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; one 80-gallon parts washer installed in 2010 that replaced a similar capacity unit.

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

- (a) Pursuant to 326 IAC 8-3-2(a) (Cold cleaner degreaser control equipment and operating requirements), for cold cleaning operations constructed after July 1, 1990, the Permittee shall ensure that 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) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
  - (3) 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.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

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- (a) Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers), on and after January 1, 2015, the Permittee shall not operate the cold cleaner degreaser with a solvent that has a VOC composite partial 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).
  
- (b) On and after January 1, 2015, the following record keeping requirements shall apply:
  - (1) The Permittee shall maintain each of the following records for each solvent purchased for use in the cold cleaner degreaser operation:
    - (A) The name and address of the solvent supplier.
    - (B) The date of purchase (or invoice/bill date of contract servicer indicating service date).
    - (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).

#### D.5.3 Record Keeping Requirements

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To document the compliance status with Condition D.5.2(b), all records shall be maintained in accordance with Section C. Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION E.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]

- (c) Sub-Micro (SM) Lines 3, 4 and 6 support equipment, consisting of storage tanks (Unit ID #s 11.1 through 11.6).

Under NESHAP Subpart EEEE, storage tanks (Unit ID #s 11.1 through 11.6) are considered existing affected sources.

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

### National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)

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

Pursuant to 40 CFR 63.2398, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 12 of 40 CFR Part 63, Subpart EEEE in accordance with schedule in 40 CFR 63 Subpart EEEE.

#### E.1.2 NESHAP Subpart EEEE Requirements [40 CFR Part 63, Subpart EEEE]

Pursuant to 40 CFR Part 63, Subpart EEEE, the Permittee shall comply with the provisions of 40 CFR Part 63.2330, as specified below. The entire text of 40 CFR 63, Subpart EEEE is included as Attachment A to this permit.

- (1) 40 CFR 63.2330
- (2) 40 CFR 63.2334
- (3) 40 CFR 63.2338
- (4) 40 CFR 63.2342(b)(1)
- (5) 40 CFR 63.2343(b), (c), (d)
- (6) 40 CFR 63.2350
- (7) 40 CFR 63.2382(a), (b)(1)
- (8) 40 CFR 63.2386(a), (b), (c)(1) through (4), (c)(10)
- (9) 40 CFR 63.2390(a)
- (10) 40 CFR 63.2394
- (11) 40 CFR 63.2398
- (12) 40 CFR 63.2402
- (13) 40 CFR 63.2406
- (14) Applicable Portions of Table 1 of Subpart EEEE
- (15) Applicable Portions of Table 12 of Subpart EEEE

#### E.1.3 One Time Deadlines Relating to NESHAP EEEE

- (a) The Permittee submitted Initial Notification on November 9, 2006 [40 CFR 63.2382(b)].
- (b) The Permittee shall conduct initial compliance demonstrations no later than February 3, 2007 [40 CFR 63.2342].
- (c) The Permittee shall submit first Semi-annual Compliance Report no later than July 31, 2007 [40 CFR 63.2386(b)(1)(ii)].

**SECTION E.2**

**FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(14)]
(d) One (1) boiler, identified as Unit ID # 1.1, constructed in 1979, with a maximum heat input capacity of 12.553 MMBtu per hour, combusting natural gas or No. 2 fuel oil, exhausting through one (1) stack, identified as S/V ID # 1;
(e) One (1) natural gas-fired boiler (500 HP), identified as Unit ID # 2.1-2, installed in 2011, with a maximum heat input capacity of 20.94 MMBtu per hour, exhausting through one (1) stack, identified as S/V ID # 2. Under 40 CFR 60, Subpart Dc, this is an affected Small Industrial-Commercial-Institutional Steam Generating Unit.

**E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.7565, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the above affected emission units as specified in Table 10 of 40 CFR 63, Subpart DDDDD in accordance with the schedule in 40 CFR 63 Subpart DDDDD.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

and

United States Environmental Protection Agency, Region 5  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**E.2.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters Requirements [40 CFR Part 63, Subpart DDDDD] for existing units**

The provisions of 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters) apply to Boiler ID #1.1, which is classified as an existing unit designed to burn gas 1 and Permittee shall comply with the following provisions no later than January 31, 2016.

- (1) 40 CFR § 63.7480
- (2) 40 CFR § 63.7485
- (3) 40 CFR § 63.7490(d)
- (4) 40 CFR § 63.7491
- (5) 40 CFR § 63.7495(b)
- (6) 40 CFR § 63.7499
- (7) 40 CFR § 63.7500(a)(1), (e), (f)
- (8) 40 CFR § 63.7501

- (9) 40 CFR § 63.7505(a)
  - (10) 40 CFR § 63.7510(e)
  - (11) 40 CFR § 63.7515(d)
  - (12) 40 CFR § 63.7540(a)(10), (13), (d)
  - (13) 40 CFR § 63.7545(a), (b), (f)
  - (14) 40 CFR § 63.7550(a), (b), (c)(1), (c)(5)(i) through (iv), (xiv) and (xvii)
  - (15) 40 CFR § 63.7555(a), (h)
  - (16) 40 CFR § 63.7560
  - (17) 40 CFR § 63.7565
  - (18) 40 CFR § 63.7570
  - (19) 40 CFR § 63.7575,
- Table 3 to Subpart DDDDD of Part 63 (sections 3, 4)  
Table 9 to Subpart DDDDD of Part 63 (section 1.a.)  
Table 10 to Subpart DDDDD of Part 63

**E.2.3 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters Requirements [40 CFR Part 63, Subpart DDDDD] for new units**

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The provisions of 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters) apply to Boiler ID #2.1-2 which is classified as a new unit designed to burn gas 1, and Permittee shall comply with the following provisions by January 31, 2013.

- (1) 40 CFR § 63.7480
  - (2) 40 CFR § 63.7485
  - (3) 40 CFR § 63.7490(b)
  - (4) 40 CFR § 63.7491
  - (5) 40 CFR § 63.7495(a), (d)
  - (6) 40 CFR § 63.7499
  - (7) 40 CFR § 63.7500(a)(1), (e) (f)
  - (8) 40 CFR § 63.7501
  - (9) 40 CFR § 63.7505(a)
  - (10) 40 CFR § 63.7510(g)
  - (11) 40 CFR § 63.7515(d)
  - (12) 40 CFR § 63.7540(a)(10), (13), (d)
  - (13) 40 CFR § 63.7545(a), (b)
  - (14) 40 CFR § 63.7550(a), (b), (c)(1), (c)(5)(i) through (iv), (xiv) and (xvii)
  - (15) 40 CFR § 63.7555(a), (h)
  - (16) 40 CFR § 63.7560
  - (17) 40 CFR § 63.7565
  - (18) 40 CFR § 63.7570
  - (19) 40 CFR § 63.7575,
- Table 3 to Subpart DDDDD of Part 63 (sections 3)  
Table 9 to Subpart DDDDD of Part 63 (section 1.a.)  
Table 10 to Subpart DDDDD of Part 63

### SECTION E.3

### FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(14)]

- (e) One (1) natural gas-fired boiler (500 HP), identified as Unit ID # 2.1-2, installed in 2011, with a maximum heat input capacity of 20.94 MMBtu per hour, exhausting through one (1) stack, identified as S/V ID # 2. Under 40 CFR 60, Subpart Dc, this is an affected Small Industrial-Commercial-Institutional Steam Generating Unit.

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

#### New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

- E.3.1 General Provisions Relating to New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units [326 IAC 12-1][40 CFR Part 60, Subpart A] [40 CFR Part 60, Subpart Dc]

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Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1-1 for the for the natural gas-fired boiler (Unit ID # 2.1-2) as specified in Appendix A of 40 CFR Part 60, in accordance with the schedule in 40 CFR 60, Subpart Dc.

- E.3.2 New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR Part 60, Subpart Dc]

---

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart Dc, which are incorporated by reference as 326 IAC 12-1 for the natural gas-fired boiler (Unit ID # 2.1-2).

- (1) 40 CFR 60.40c
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.48c(a), (g)(1), (i)

## SECTION E.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)] - Insignificant Activity:

- (m) Stationary fire pumps- one 334 HP diesel fire pump installed in 2013.

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

### New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

#### E.4.1 General Provisions Relating to New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines [326 IAC 12-1][40 CFR Part 60, Subpart A] [40 CFR Part 60, Subpart IIII]

The provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1-1, apply to the emergency fire pump engine installed in 2013, except when otherwise specified in 40 CFR 60, Subpart IIII.

#### E.4.2 New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines [40 CFR Part 60, Subpart IIII]

- (a) Pursuant to 40 CFR Part 60, Subpart IIII, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart IIII, which are incorporated by reference as 326 IAC 12-1, for the 334 HP emergency fire pump engine installed in 2013 upon startup:

- 1) 40 CFR § 60.4205(c)
- (2) 40 CFR § 60.4206
- (3) 40 CFR § 60.4207(b)
- (4) 40 CFR § 60.4209(a)
- (5) 40 CFR § 60.4211(a), (c), (f), (g)(2)
- (6) 40 CFR § 60.4214(b)
- (7) 40 CFR § 60.4218
- (8) 40 CFR § 60.4219
- (9) Table 4 to Subpart IIII of Part 60
- (10) Table 5 to Subpart IIII of Part 60
- (11) Table 8 to Subpart IIII of Part 60

## SECTION E.5

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)] - Insignificant Activity:

- (m) Stationary fire pumps- one 334 HP diesel fire pump installed in 2013.

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

#### E.5.1 National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines (RICE) [40 CFR Part 63, Subpart ZZZZ]

Pursuant to 40 CFR Part 63, Subpart ZZZZ, the emergency fire pump shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ by complying with the requirements of 40 CFR Part 60, Subpart IIII, for compression ignition engines as required in the following provision of 40 CFR 63, Subpart ZZZZ.

- (1) 40 CFR § 63.6590(c)(6)

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Daramic, LLC  
Source Address: 3430 Cline Road NW, Corydon, Indiana, 47112  
Part 70 Permit No.: T-061-31760-00012

**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: Daramic, LLC  
Source Address: 3430 Cline Road NW, Corydon, Indiana, 47112  
Part 70 Permit No.: T-061-31760-00012

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)  |
| X 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                    |
| X The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. |

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

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

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

**Page 2 of 2**

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

Form Completed by:

Title / Position:

Date:

Phone:

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

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Daramic, LLC  
Source Address: 3430 Cline Road NW, Corydon, Indiana, 47112  
Part 70 Permit No.: T-061-31760-00012

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

Page 1 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

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

**Addendum to the Technical Support Document (ATSD) for a Significant  
Source Modification and a Significant Permit Modification**

**Source Description and Location**

Source Name:	Daramic, LLC
Source Location:	3430 Cline Road, Corydon, IN 47112-6908
County:	Harrison
SIC Code:	3089
Operation Permit No.:	T 061-31760-00012
Operation Permit Issuance Date:	July 10, 2014
Significant Source Modification No.:	061-35587-00012
Significant Permit Modification No.:	061-35655-00012
Permit Reviewer:	Aida DeGuzman

On May 5, 2015 the Office of Air Quality (OAQ) had a notice published in the Corydon Democrat, Corydon, Indiana, stating that Daramic, LLC had applied for a Significant Source Modification and a Significant Permit Modification to re-evaluate the BACT established in SSM No. 061-32841-00012, issued on June 17, 2014 and Part 70 Operating Permit Renewal T061-31760-00012, issued on July 10, 2014. The notice also stated that the OAQ proposed to issue the permits and provided information on how the public could review the proposed permits and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

On May 12 2015, Daramic, LLC made the following comments on the draft permits. Additions are **bolded** and deletions are ~~struck through~~ for emphasis:

**Comment 1:**

In Condition B.13(a) of the SPM and SSM, the reference to the 2009 SSM should be updated to refer instead to T061-35655-00012.

**Response to Comment 1:**

Condition B.13(a) normally references the most recent operating permit, in this case Daramic's most recent Part 70 Operating Permit is T061-31760-00012. Therefore, the typographical error in Condition B.13(a) was corrected as follows:

**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 ~~T061-265840-00012~~ **T061-31760-00012** 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.

**Comment 2:**

In Condition B.19(a)(4) of the SPM, the address reference to "Region V" should be corrected to "Region 5."

**Response to Comment 2:**

IDEM, OAQ changed Region V address to Region 5 throughout the permits as follows:

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

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(a) \*\*\*

United States Environmental Protection Agency, Region V 5  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

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(a) \*\*\*

- (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 5  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

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(a) \*\*\*

(b) \*\*\*

United States Environmental Protection Agency, Region V 5  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

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

**Source Description and Location**

Source Name:	Daramic, LLC
Source Location:	3430 Cline Road, Corydon, IN 47112-6908
County:	Harrison
SIC Code:	3089
Operation Permit No.:	T061-31760-00012
Operation Permit Issuance Date:	July 10, 2014
Significant Source Modification No.:	061-35587-00012
Significant Permit Modification No.:	061-35655-00012
Permit Reviewer:	Aida DeGuzman

**Existing Approvals**

The source was issued Part 70 Operating Permit No. 061-31760-00012, issued on July 10, 2014. The source is operating under the following approvals:

- (a) Minor Source Modification No. 061-35365-00012, issued on February 20, 2015; and
- (b) Minor Permit Modification No. 061-35452-00012, is expected to be issued on April 22, 2015.

**County Attainment Status**

The source is located in Harrison County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> 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<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Harrison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
Harrison County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
Harrison County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

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

### 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	14.42
PM <sub>10</sub>	5.78
PM <sub>2.5</sub>	5.49
SO <sub>2</sub>	3.37
NO <sub>x</sub>	30.78
VOC	312.47
CO	18.28
<b>HAPs</b>	
TCE	263.06
<b>Total</b>	263.39

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](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 GHG 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).

- (c) These emissions are based upon the TSD for the latest permit SSM No. 061-35365-00012, issued on February 4, 2015.

#### **Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed a source modification application submitted by Daramic, LLC on March 12, 2015, relating to the re-evaluation of the BACT established in SSM No. 061-32841-00012, issued on June 17, 2014 and Part 70 Operating Permit Renewal T061-31760-00012, issued on July 10, 2014. The source appealed both of these permits: SSM No. 061-32841-00012 with Cause No. 14-A-J-4738 and Part 70 No. T061-21760 with Cause No. 14-A-J-4743.

#### **Enforcement Issues**

There are no enforcement actions for this modification.

#### **Permit Level Determination – Part 70 Modification to an Existing Source**

This modification does not involve new equipment that would emit air pollutants. However, this modification is subject to a Significant Source Modification under 326 IAC 2-7-10.5(g)(2), because it is a re-evaluation of BACT under 326 IAC 8-1-6.

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a Significant Permit Modification issued pursuant to 326 IAC 2-7-12(d), because the modification involves incorporating case-by-case BACT limitations that cannot be accomplished under the provisions of administrative or minor permit modification rules.

#### **Federal Rule Applicability Determination**

This modification will not affect the federal rules that already have been determined to be applicable to the source and no new rules will be triggered due to the change.

#### **State Rule Applicability Determination**

- (a) 326 IAC 8-1-6 (New facilities; general reduction requirements)

The VOC BACT is being re-evaluated under this rule for the following emission units and processes with potential VOC emissions equal to or greater than 25 tons/year:

- (1) SM Line 4 installed in 1984,
- (2) SM Line 6 installed in 1991,
- (3) Equipment and Component Leaks, and
- (4) Uncaptured VOC emissions around oil extraction lines and plantwide.

IDEM determined in SSM No. 061-32841-00012, issued on June 17, 2014, and Part 70 Operating Permit Renewal T061-31760-00012, issued on July 10, 2014, that a carbon adsorption system (CAS) with a minimum control efficiency of no less than 98% is BACT under 326 IAC 8-1-6 for the above emission units. This BACT determination was based on PSD BACT requirements for Daramic's Carbon Adsorber 2 (CAS2) located at its Owensboro, Kentucky plant. The BACT is being re-evaluated in this permitting action. See detailed re-evaluation of BACT in Attachment A (BACT Analysis).

**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 determination and monitoring requirements already determined for the source will be revised to reflect the revised BACT under this permitting action. See the proposed changes below:

**Proposed Changes**

The changes listed below have been made to Part 70 Operating Permit Renewal No. 061-31760-00012. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

**Changes to Section D.1:**

*The change in the overall control efficiency of the a Carbon Adsorption System (CAS), based on the revised BACT from 98% to 96%, will result in the PTE shown in the table below:*

EMISSION POINT / ACTIVITY	Uncontrolled PTE	PTE Based on 98% Control Efficiency of CAS (tons/yr)	PTE Based on 98% Control Efficiency of CAS (pounds/hour)	PTE Based on 96% Control Efficiency of CAS (tons/yr)	PTE Based on 98% Control Efficiency of CAS (pounds/hour)
<b>CATEGORY 1 - EXTRACTION EQUIPMENT AND OPERATIONS</b>					
Carbon Beds	5066.51	101.33	23.1	202.66	46.2
Extractor Pan Filter Changes	2.96	2.96	--	2.96	--
Extractor Pan Sampling Lines	15.81	15.81	--	15.81	--
Equipment Leaks (Process)	51.83	51.83	--	51.83	--
QC Lab & operator checks	3.12	3.12	--	3.12	--
Extractor Pan Lid Openings (TCE evaporation when lids removed to attend to web breaks)	0.24	0.24	--	0.24	--
Oven Openings (TCE lost when oven open to attend to web breaks)	0.29	0.29	--	0.29	--
Oven Cycling (TCE lost when vacuum in oven is reduced as oven cycles from hot to standby)	14.66	14.66	--	14.66	--

EMISSION POINT / ACTIVITY	Uncontrolled PTE	PTE Based on 98% Control Efficiency of CAS (tons/yr)	PTE Based on 98% Control Efficiency of CAS (pounds/hour)	PTE Based on 96% Control Efficiency of CAS (tons/yr)	PTE Based on 98% Control Efficiency of CAS (pounds/hour)
Shutdown/Extractor Pan Cleanout (TCE evaporation due to pan lids removed)	8.78	8.78	--	8.78	--
<b>SUBTOTAL</b>	<b>5164.21</b>	<b>199.02</b>	<b>--</b>	<b>199.02</b>	<b>--</b>
<b>CATEGORY 2 - MATERIAL REMOVED DURING START-UPS OR MALFUNCTIONS, (CONTROLLABLE BY SMOKEHOUSE)</b>					
Wet Folds (TCE evaporation from sheet that is removed from the process)	Included in Carbon Beds Emission Total				
Web Breaks (TCE evaporation from sheet that is removed from the process)					
Startups (TCE in Sheet evaporation)					
Wet Folds (TCE evaporation from sheet that is removed from the process)	1.25	1.25	--	1.25	--
Web Breaks (TCE evaporation from sheet that is removed from the process)	1.16	1.16	--	1.16	--
Startups (TCE in Sheet evaporation)	0.65	0.65	--	0.65	--
<b>SUBTOTAL</b>	<b>3.06</b>	<b>3.06</b>	<b>--</b>	<b>3.06</b>	<b>--</b>
<b>CATEGORY 3 - SUPPORT EQUIPMENT INVENTORY LOSSES</b>					
Miscella Tanks Filter Changes	11.13	11.13	--	11.13	--
Distillation Filter Changes	8.07	8.07	--	8.07	--
Distillation Sampling Lines	1.94	1.94	--	1.94	--
<b>SUBTOTAL</b>	<b>21.14</b>	<b>21.14</b>	<b>--</b>	<b>21.14</b>	<b>--</b>
<b>CATEGORY 4 - OFFSITE FUGITIVE/UNCAPTURED INVENTORY LOSSES</b>					
TCE in Product	20.39	20.39	--	20.39	--
TCE in Wastewater Discharge	0.40	0.40	--	0.40	--
CE in Waste Material	2.63	2.63	--	2.63	--
<b>CATEGORY 5 - ONSITE FUGITIVE/UNCAPTURED INVENTORY LOSSES</b>					
Equipment Leaks (Tanks/Distillation)	20.15	20.15	--	20.15	--
Wastewater (TCE lost in building)	5.88	5.88	--	5.88	--
TCE normally in oil (lost at extruder)	2.07	2.07	--	2.07	--
Equipment Upsets	13.00	13.00	--	13.00	--
<b>SUBTOTAL</b>	<b>39.64</b>	<b>39.64</b>	<b>--</b>	<b>39.64</b>	<b>--</b>
<b>PLANT-WIDE TCE/VOC EMISSIONS INVENTORY LOSS (TONS/YEAR)</b>	<b>5251.47</b>	<b>286.29</b>	<b>--</b>	<b>387.62</b>	<b>--</b>
<b>PLANT-WIDE TCE/VOC EMISSIONS (TONS/YEAR)</b>	<b>5228.05</b>	<b>262.87</b>		<b>364.20</b>	<b>--</b>

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

#### **D.1.1 General Reduction Requirements - BACT [326 IAC 8-1-6]**

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- (a) Pursuant to 326 IAC 8-1-6, the Permittee shall comply with the following BACT requirements:
- (1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, Sub-Micro (SM) Line 4 and Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4) shall be controlled by a Carbon Adsorption System (CAS) with an overall control efficiency of no less than ~~98~~ **96%**.
  - (2) The VOC emissions from the CAS stack (S/V ID # 17) shall not exceed ~~23.1~~ **46.2** pounds per hour.
  - (3) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.
- (b) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4) when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the CAS but the control efficiency of ~~98-96%~~ shall not apply due to the expected low VOC inlet concentration.
- (c) The control efficiency of ~~98-96%~~ shall not apply when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID #11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.
- (d) The implementation of a leak detection and repair (LDAR) program for equipment leaks as follows:
- (1) The Permittee shall develop a written LDAR program requiring leak checks of all equipment in trichloroethylene service.
  - (2) The LDAR program shall include the following elements:
    - (A) Written LDAR program - The written LDAR program shall specify the source's specific procedure for recordkeeping, certifications, monitoring and repair
    - (B) Training - The training programs can vary according to the level of involvement and degree of responsibility of LDAR personnel.
    - (C) LDAR audits - The audits shall check that the correct equipment is being monitored, LDAR program procedures are being followed, leaks are being fixed and the required records are being kept.
    - (D) Contractor accountability - The LDAR program shall describe oversight procedures to increase the accountability of contractors.
    - (E) Internal leak definition - The LDAR program shall include the internal leak definition applicable to equipment in TCE service
    - (F) More frequent monitoring - To ensure that leaks are still being identified in a timely manner and that previously unidentified leaks are not worsening over time, implement a plan for more frequent monitoring for components that contribute most to equipment leak emissions.

- (G) First attempt at repair - Time frames and practices must be established for first attempt at repairing components to stop detected leaks while still small.
- (H) Delay of repair compliance assurance - Any component that cannot be repaired during the specified repair interval must be placed on a "Delay of Repair" list to be repaired during the next shutdown cycle. Delay of repair compliance assurance procedures are to be included to ensure that the appropriate equipment is justifiably on the "Delay of Repair" list.
- (I) Electronic monitoring and storage of data - Maintenance of an electronic database for storing and reporting LDAR data and use of data loggers or other data collection devices during all LDAR monitoring.
- (J) QA/QC of LDAR data - A procedure to ensure QA/QC review of all data generated by LDAR monitoring.
- (K) Calibration drift assessment - Calibration of LDAR monitoring equipment using an appropriate calibration gas, in accordance with 40 CFR Part 60, EPA Reference Test Method 21.
- (L) Records of maintenance - Records must be maintained for the LDAR program in accordance with Section C - General Record Keeping Requirements.

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#### D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Within one hundred eighty (180) days after the issuance of this modification SSM No. 061-32841-00012 associated with the production increase of 100 million square meters per year, the Permittee shall perform VOC testing of the carbon adsorption system (CAS) to demonstrate compliance with Condition D.1.1(a)(1) and (2), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~

**Within five (5) years from the most recent compliant stack test, the Permittee shall perform VOC testing of the carbon adsorption system (CAS) to demonstrate compliance with Condition D.1.1(a)(1) and (2), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

### **Compliance Monitoring Requirements**

#### D.1.5 Carbon Adsorption System Monitoring [40 CFR Part 64] [326 IAC 3-8]

Pursuant to 326 IAC 3-8 (CAM), and to ensure compliance with Conditions D.1.1(a) and proper operation of the carbon adsorber, the following compliance monitoring is required:

- (a) The Permittee shall certify and maintain a continuous VOC monitoring system within 180 days of permit issuance.
- (b) The continuous VOC monitoring system shall be calibrated and operated to measure the control efficiency of the carbon adsorber system (CAS) serving oil extraction systems for SM-3, SM-4 and SM-6. The continuous VOC monitoring system shall be in operation at all times the oil extraction systems for Lines SM-4 or SM-6 are in operation, except during periods the monitoring system is undergoing quality assurance/quality control checks,

repairs, replacement or maintenance or is malfunctioning. "Continuous" shall mean the collection of at least one measurement of CAS inlet and CAS outlet VOC concentrations for each 15-minute block period. Compliance is indicated if the 24-hour average CAS control efficiency is no less than ~~98~~**96** %.

- (c) Relative Accuracy Test Audits (RATAs) must be performed on the monitoring system no less than once every 5 years.
- (d) Zero and Span calibrations shall be performed no less frequently than once per week. According to the procedures of 40 CFR Part 60 Appendix F Section 4.0, any reading in excess of 2.5% of span would require immediate corrective action, any reading greater than 10% of span would be considered out of control.
- (e) The Permittee shall respond to monitor out of control periods as defined in 40 CFR Part 60, Appendix F, Section 4.3.1.
- (f) Quarterly Cylinder Gas Audits shall be performed in any quarter where a RATA is not conducted.
- (g) If the continuous VOC monitoring system is down for more than 5 days, the Permittee shall take daily instantaneous measurements of the outlet VOC concentration of the CAS (using a handheld flame ionization detector, photo-ionization detector or comparable device) and at the same time record the value of the CAS exhaust gas flow rate. Provided the CAS exhaust gas flow rate is less than or equal to 5,652 standard cubic feet per minute (scfm), compliance is indicated if the CAS outlet VOC concentration is less than ~~200~~ **400** ppmv, and no measurement of the CAS inlet VOC concentration or calculation of CAS efficiency is required for that day. If the outlet CAS VOC concentration is greater than ~~200~~ **400** ppmv, then a daily grab measurement of the CAS inlet VOC concentration (using a colorimetric tube analysis) shall also be taken and the CAS control efficiency calculated to provide an indication of compliance. CAS control efficiency shall be calculated using the VOC concentration data as follows:

$$\text{CAS Efficiency (\%)} = [(CAS_{\text{inlet}} - CAS_{\text{outlet}}) / (CAS_{\text{inlet}})] \times 100$$

Daily measurements of CAS exhaust gas flow rate and VOC inlet and outlet concentrations shall be taken within the final 30 minutes of a carbon bed cycle and shall be taken when the CAS cooling air blower is not operating. The CAS cooling air blower is not operating when the measured CAS exhaust gas flow rate is less than or equal to 5,652 scfm. In the event that the outlet VOC concentration is greater than ~~200~~ **400** ppmv and the CAS efficiency is less than ~~98~~**96**%, the Permittee shall perform reasonable response steps to achieve ~~98~~**96** CAS efficiency. During continuous VOC monitoring system downtime, the Permittee shall continue to make daily CAS efficiency calculations until a CAS efficiency of ~~98~~**96**% or more is achieved for seven (7) consecutive operating days. Upon achieving a daily CAS efficiency of ~~98~~**96**% or more for seven (7) consecutive operating days, the Permittee may resume daily measurement of the outlet VOC concentration during continuous VOC monitoring system downtime.

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

### D.1.8 Reporting Requirements

A semi-annual report shall be submitted no later than thirty (30) days after the end of the semi-annual period being reported. The report shall contain a monthly summary of the readings from the continuous VOC monitoring system to document the compliance status with Conditions D.1.1(a) and D.1.5. The report shall include the following information:

- (1) 24-hour average or daily average CAS control efficiency readings less than ~~98~~**96**% and date of such readings.
- (2) Continuous VOC monitoring system instrument downtime, except for zero (0) and span checks, shall include the following:
  - (A) Date of downtime.
  - (B) Time of commencement.
  - (C) Duration of each downtime.
  - (D) Reasons for each downtime.
  - (E) Nature of system repairs and adjustments.
- (3) A notation and a reason for a lack of readings from the continuous VOC monitoring system (e.g., the process did not operate that day).
- (4) If there are no excess emissions or continuous VOC monitoring instrument downtime in a reporting period, the Permittee shall submit a report indicating that no excess emissions or downtime incidents occurred in the reporting period.
- (5) The semi-annual report shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit.

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).

**Changes to Section D.2:**

*The source indicated that Condition D.2.1 has incorrect process weight rates for Unit ID Nos. 6.1 and 6.2 and Unit ID No. 5.1. The correct process weight rate for all these units is 0.75 ton/hr.*

**D.2.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the following operations shall not exceed the pound per hour limit listed in the table below:

Process/Facility	Process Weight Rate (tons/hr)	Particulate Emissions Limit (lbs/hr)
SM 3/4 Silo 01 (Unit ID # 4.1)	10.0	19.18
SM 3/4 Silo 02 (Unit ID # 4.2)	10.0	19.18
SM 3/4 Silo 03 (Unit ID # 4.3)	7.5	15.82
SM 3/4 Silo 04 (Unit ID # 4.4)	7.5	15.82
SM 6 Silo 05 (Unit ID # 4.5)	7.5	15.82
Silica Unload System (Unit ID # 3.1)	5.25	12.45
SM 6 Silica Day Bin (Unit ID # 7.1)	0.4002	2.22
SM 6 PE Day Bin (Unit ID # 7.2)	0.1538	1.17
SM 3/4 Day Bin (Unit ID # 6.1)	<del>0.3147</del> <b>0.75</b>	<del>4.89</del> <b>3.38</b>
SM 3/4 Day Bin (Unit ID # 6.2)	<del>0.3147</del> <b>0.75</b>	<del>4.89</del> <b>3.38</b>
SM 3/4 Silica Transporter (Unit ID # 5.1)	<del>10.3147</del> <b>0.75</b>	<del>4.89</del> <b>3.38</b>
Silo Dilute Phase Transporter (Unit ID # 13)	10	19.18
Polyethylene day bin line 3 (F05.1)	0.1132	0.95
Silica day bin line 3 (F01.1)	0.2945	1.81
Polyethylene day bin line 4 (F05.2)	0.1210	1.0
Silica day bin line 4 (F01.2)	0.3147	1.89

### Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 061-35587-00012 and Significant Permit Modification No. 061-35655-00012. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modifications be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Aida DeGuzman 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) 233-4972 or toll free at 1-800-451-6027 extension 3-4972.
- (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  
Office of Air Quality**

**ATTACHMENT A  
BACT ANALYSIS**

**Source Description and Location**

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Source Location:	3430 Cline Road NW, Corydon, Indiana 47112
County:	Harrison
SIC Code:	3089
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**Background Information**

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Daramic, LLC on March 12, 2015, relating to the re-evaluation of the BACT established in SSM No. 061-32841-00012, issued on June 17, 2014 and Part 70 Operating Permit Renewal T061-31760-00012, issued on July 10, 2014. The source appealed both of these permits; SSM No. 061-32841-00012 with Cause No. 14-A-J-4738; and Part 70 No. T061-31760 with Cause No. 14-A-J-4743.

**History of Existing BACT**

IDEM determined that a carbon adsorption system (CAS) with a minimum control efficiency of no less than 98% is BACT under 326 IAC 8-1-6 based upon BACT requirements for Daramic's Carbon Adsorber 2 (CAS2) located at its Owensboro, Kentucky plant. Condition D.1.5(b) of the Part 70 Operating Permit Renewal 061-31760-00012 provides that compliance is indicated if the 24-hour average CAS control efficiency is no less than 98%. On July 2, 2014 and July 25, 2014, Daramic filed separate Petitions for Administrative Review with the Indiana Office of Environmental Adjudication appealing these two permitting actions, which were subsequently consolidated as Cause Nos. 14-A-J-4738 and 14-A-J-4743. The requests for review included an appeal of the 98% minimum control efficiency required for the CAS.

On September 24, 2014, representatives of Daramic, Indiana met with representatives of IDEM for the purpose of attempting to resolve the permit appeals. During the settlement conference, IDEM acknowledged that the BACT of 98% control efficiency demonstrated on a 24-hour average basis required in the Indiana permit is more stringent than Daramic, Kentucky's BACT of 98% demonstrated on a monthly average, which was the basis for Daramic, Indiana's BACT.

## BACT Analysis

The BACT analysis conducted by IDEM, OAQ was based on the “Top-Down Approach: BACT Approach” outlined in the draft U.S. EPA New Source Review Workshop Manual, published by USEPA, Office of Air Quality Planning Standards, March 15, 1990.

The BACT analysis was based on the following sources of information which were reviewed or contacted:

- (a) RACT/BACT/LAER Information System; USEPA, BACT/LAER Clearinghouse;
- (b) Compilation of Control Technology; USEPA, BACT/LAER Clearinghouse
- (c) EPA, State, and Local Air Quality permits and applications where related;
- (d) Control equipment and material vendors; and,
- (e) OAQPS Control Cost Manual.

### BACT Definition and Applicability

Federal guidance on BACT requires an evaluation that follows a “top down” process. In this approach, the applicant identifies the best-controlled similar source on the basis of controls required by the regulation or the permit, or the controls achieved in practice. The highest level of control is then evaluated for technical feasibility.

The five basic steps of a top-down BACT analysis are listed below:

#### **Step 1: Identify Potential Control Technologies**

The first step is to identify potentially “available” control options for each emission unit and for each pollutant under review. Available options should consist of a comprehensive list of those technologies with a potentially practical application to the emissions unit in question. The list should include lowest achievable emission rate (LAER) technologies, innovative technologies and controls applied to similar source categories.

#### **Step 2: Eliminate Technically Infeasible Options**

The second step is to eliminate technically infeasible options from further consideration. To be considered feasible, a technology must be both available and applicable. It is important in this step that any presentation of a technical argument for eliminating a technology from further consideration be clearly documented based on physical, chemical, engineering and source-specific factors related to safe and successful use of the controls.

#### **Step 3: Rank the Remaining Control Technologies by Control Effectiveness**

The third step is to rank the technologies not eliminated in Step 2 in order of descending control effectiveness for each pollutant of concern. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical or economic evaluation, except for the environmental analyses.

#### **Step 4: Evaluate the Most Effective Controls and Document the Results**

The fourth step entails an evaluation of energy, environmental and economic impacts for determining a final level of control. The evaluation begins with the most stringent control option and continues until a technology under consideration cannot be eliminated based on adverse energy, environmental, or economic impacts.

**Step 5: Select BACT**

The fifth and final step is to select as BACT the most effective of the remaining technologies under consideration for each pollutant of concern. BACT must, at a minimum, be no less stringent than the level of control required by any applicable New Source Performance Standard (NSPS) and National Emissions Standard for Hazardous Air Pollutants (NESHAP) or state regulatory standards applicable to the emission units included in the permits.

**BACT for Volatile Organic Compounds (VOC)**

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

This rule applies to new facilities (as of January 1, 1980) that have potential emissions of twenty-five (25) tons or more per year, located anywhere in the state; and are not otherwise regulated by other provisions of this article; 326 IAC 20-48; or 326 IAC 20-56; shall reduce VOC emissions using best available control technology (BACT).

- (a) Sub-Micro (SM) Line 3 was installed in 1979. Therefore, it is not subject to 326 IAC 8-1-6.
- (b) The extrusion process is not subject to 326 IAC 8-1-6 because the VOC potential emissions for each line, SM Line 4 and SM Line 6 is less than 25 tons per year.

VOC BACT is being re-evaluated under this rule for the following emission units and processes with potential VOC emissions equal to or greater than 25 tons/year:

- (a) SM Line 4 installed in 1984,
- (b) SM Line 6 installed in 1991, and
- (c) Equipment and Component Leaks.

<b>EMISSION SOURCE</b>	<b>Uncontrolled PTE Based Upon 100 MM<sup>2</sup>/year (tons/year)</b>
SM Line 4 and SM Line 6	5,066.51
Fugitive VOC Emissions Around Extraction Process - Category 1 Excluding CAS and Equipment Leaks-	45.86
Fugitive VOC Emissions due to Plant-wide Equipment Leaks:	162.99 total

## STEPS 1 and 2 – IDENTIFICATION/ELIMINATE CONTROL TECHNOLOGIES OF VOC

- (a) **Carbon Adsorption System (CAS)** - Activated carbon beds have a track record of successful application for adsorbing VOC emissions. Based upon EPA study as recorded in EPA-450/3-88-012, CAS can achieve control efficiencies from 97% - 99% for a variety of solvents or chemical constituents in the air stream from different types of industries. However, when an exhaust stream contains other contaminants such as particulates and moisture, the technology loses its efficiency. The presence of moisture and particulates in the exhaust stream will require significant gas pre-conditioning since these interferences are deleterious to the efficiency of the carbon bed. In effect, they induce a masking phenomenon reducing the available adsorption surface area. This control technology is currently in operation at the source and, therefore, has been determined to be technically feasible in Daramic's trichloroethylene (TCE)-laden process air stream. Further consideration of this technology including its economic, energy and environmental impacts are further discussed in the BACT analysis.
- (b) **Thermal Oxidizer/Thermal Oxidizer with Heat Exchanger** - Thermal oxidizers are control devices in which the solvent-laden air is preheated and the organic HAPs are ignited and combusted to carbon dioxide and water. Dilute gas streams require auxiliary fuel (generally natural gas) to sustain combustion. Various incinerator designs are used by different manufacturers. The combustion chamber design must provide high turbulence to mix the fuel and solvent-laden air. The other requirement is enough residence time to ensure essentially complete combustion. Daramic's air stream consists of an oil mist that carries the portion of TCE that is of concern. The accumulation of the oil mist in the bottom of the poppet valve reservoir would likely cause build-up in the heat-transfer media and lead to a run-away reaction (out-of-control temperatures) because the oxidation of the build-up material is highly exothermic. Therefore, this technology is not considered technically feasible and no further evaluation will be made.
- (c) **Catalytic Incineration** – Catalytic incinerators are control devices in which the solvent-laden air is preheated and the organic HAPs are ignited and combusted to carbon dioxide and water. In the presence of a catalyst, this reaction will take place at lower temperatures than those required for thermal oxidation. Temperatures between 350 and 500 degrees Celsius are common. The catalysts are metal oxides or precious metals supported on ceramic or metallic substrates. Daramic's air stream consists of an oil mist containing TCE that is of concern. The accumulation of the oil mist in the bottom of the poppet valve reservoir would likely cause build-up in the heat-transfer media and lead to a run-away reaction (out-of-control temperatures) because the oxidation of the build-up material is highly exothermic. Therefore, this technology is not considered technically feasible and no further evaluation will be made.
- (d) **Volume/Rotary Concentrators** - This twin part system also known as the rotary concentrator serves to concentrate the VOCs in the inlet stream prior to an adsorption or oxidation scheme. The first section consists of a slowly rotating concentrator wheel that utilizes zeolites or carbon deposited on a substrate, which adsorbs the organics as they are exhausted from the process and passed through the wheel. A section of the concentrator wheel is partitioned off from the main section of the rotor and clean heated air is passed through this section to desorb the organics resulting in higher VOC concentration in a smaller gas flow.

Volume/rotary concentrators are usually installed upstream to an adsorption or oxidization configuration for ultimate VOC destruction. Therefore, this technology is considered technically feasible for controlling Daramic's TCE-laden air stream.

- (e) **Leak Detection and Repair (LDAR) Program** - LDAR is a work practice designed to identify leaking equipment so that emissions can be reduced through timely repairs. A manufacturing facility that is subject to LDAR requirements must be monitored at specified, regular intervals to determine whether or not it is leaking. Any leaking component must then be repaired or replaced within a specific time frame to ensure that any potential leaks of air pollutants are timely detected and repaired. LDAR is currently implemented at Daramic for all equipment in TCE service (i.e., containing more than 5% trichloroethylene and in service more than 300 hours per calendar year). Therefore, this work practice is technically feasible for controlling Daramic's TCE/VOC emissions and will be evaluated for further consideration in this BACT Analysis.

### **STEPS 3 and 4 – RANK REMAINING CONTROL TECHNOLOGIES and EVALUATE MOST EFFECTIVE CONTROLS**

As shown in Steps 1 and 2, a Volume/Rotary Concentrator and a Carbon Adsorption System (CAS) were determined to be the only add on controls that are technically feasible for the control of a trichloroethylene-laden air stream. Likewise, the LDAR Program is technically feasible in controlling a TCE-laden air stream from leak emissions sources. A Carbon Adsorption System and LDAR Program are currently the control technologies being utilized by Daramic.

#### **Economic Impact of Capturing and Controlling the Remaining Uncontrolled Leak Emissions:**

In determining the economic feasibility of controlling the remaining leak emissions, guidance provided in the USEPA reference, "OAQPS Control Cost Manual", Sixth Edition, EPA 452/B-02-001 (January, 2002) was utilized. The economic feasibility is generally expressed in terms of annualized dollars per ton of pollutant removed. By definition, cost effectiveness is the ratio of the total annualized cost of any control alternative to the annual quantity of pollutant the control alternative removes from the process.

Capital Recovery Factor was based on the default annual interest rate of 7% mandated by the Office of Management and Budget (OMB).

The following cases were analyzed to capture and control the remaining uncontrolled leak emissions:

#### **CASE 1 - Retrofit Cost Considerations**

<b>Case 1A - Using Existing CAS</b>
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- (a) **Case 1A - Custom-Fabricated Total Enclosures Surrounding Process Equipment Areas with Emissions Routed to the Existing Carbon Adsorption System (CAS)**

The following table reflects the installation of a custom-fabricated single permanent total enclosure around the extractor area and routing the exhaust from this area to the existing Carbon Adsorber System.

PRODUCTION CAPACITY	100 MM <sup>2</sup> /yr
<b>Sources of Emissions by Category</b>	<b>Process Leaks: VOC Emissions For Capture and Control (tons/yr)</b>
Carbon Beds (process emissions):	
Extractor Pan Filter Changes	2.96
Extractor Pan Sampling Lines	15.81
QC Lab & Operator Checks	3.12
Extractor Pan Lid Opening - Web Breaks	0.24
Oven Opening - Web Breaks	0.29
Oven Cycling	14.66
Shutdown/Extractor Pan Cleanout	8.78
Equipment Leaks	--
<b>Total Uncontrolled VOC/TCE Emissions (tpy)</b>	<b>45.86</b>

The following table shows the source-wide leaks emissions to be controlled:

PRODUCTION CAPACITY	100 Mm <sup>2</sup> /yr
<b>Sources of Emissions by Category</b>	<b>Plant-wide Leaks: VOC Emissions for Capture and Control (tons/yr)</b>
Carbon Beds (process emissions):	
Extractor Pan Filter Changes	2.96
Extractor Pan Sampling Lines	15.81
QC Lab & Operator Checks	3.12
Extractor Pan Lid Opening - Web Breaks	0.24
Oven Opening - Web Breaks	0.29
Oven Cycling	14.66
Shutdown/Extractor Pan Cleanout	8.78
Process Equipment Leaks	51.83
<b>Sub-Total Uncontrolled VOC/TCE Emissions (tpy)</b>	<b>97.7</b>
<u>Category 2 - Material Removed During Start-Ups or Malfunctions:</u>	
Wet Folds (TCE after sheet is removed from process)	1.25
Wet Breaks (TCE after sheet is removed from process)	1.16
Startups (TCE in sheet evaporation)	0.65
<b>Total Unreduced TCE Emissions (tpy)</b>	<b>3.06</b>
<u>Category 3 - Support Equipment Inventory Losses (Fugitive Emissions):</u>	
Miscella Tanks Filter Changes	11.13
Distillation Filter Changes	8.07
Distillation Sampling Lines	1.94
<b>Sub-Total TCE Fugitive Emissions (tpy)</b>	<b>21.14</b>
<u>Category 4 - Offsite Inventory Losses (Fugitive Emissions):</u>	
TCE in Product	--

<b>PRODUCTION CAPACITY</b>	<b>100 Mm<sup>2</sup>/yr</b>
<b>Sources of Emissions by Category</b>	<b>Plant-wide Leaks: VOC Emissions for Capture and Control (tons/yr)</b>
TCE in Wastewater Discharge	--
TCE in Waste Material	--
<b>Sub-Total TCE Fugitive Emissions (tpy)</b>	
<u>Category 5 - Onsite Fugitive/Uncaptured Inventory Losses (Fugitive Emissions - Not Reduced):</u>	--
Wastewater (TCE lost in building)	5.88
TCE normally in oil (lost in extruder)	2.07
Equipment Upsets	13.0
Equipment Leaks (Tanks/Distillation)	20.15
<b>Sub-Total TCE Fugitive Emissions (tpy)</b>	<b>41.10</b>
<b>TOTAL Source-wide</b>	<b>162.99</b>
<b>Annual TCE/VOC Removed by Existing Carbon Adsorber Control Efficiency (96%)</b>	<b>156.47</b>

Collecting the fugitive emissions by building a single structure as a permanent total enclosure around the extractors only (Extractor Pan Filter Changes, Extractor Pan Sampling Lines, QC Lab & Operator Checks, Extractor Pan Lid Opening - Web Breaks, Oven Opening - Web Breaks, Oven Cycling and Shutdown/Extractor Pan Cleanout) or the plant-wide fugitive emissions is considered impractical and cost excessive since it involves capturing a large volume of air with low VOC concentration. In addition, the existing CAS has no capacity to control an additional load.

**Case 1B - Retrofitting Existing CAS with a New Volume/Rotary Concentrator**

- (b) A retrofit option by including a Volume/Rotary Concentrator to concentrate the VOCs from around the extractors only: Extractor Pan Filter Changes, Extractor Pan Sampling Lines, QC Lab & Operator Checks, Extractor Pan Lid Opening - Web Breaks, Oven Opening - Web Breaks, Oven Cycling and Shutdown/Extractor Pan Cleanout or concentrate the Plant-wide Fugitive VOCs and then direct the concentrated VOC emissions to the existing Carbon Adsorption System. The Carbon Concentrator could concentrate the air stream at a 10 to 1 ratio. However, even at this concentrated volume, there is no capacity left at the existing Carbon Adsorber to be able to control it.

**Case 1C - Adding a New Concentrator and Retrofitting (Expanding Carbon Beds) Existing CAS to Control Fugitive VOCs Around the Extractors**

- (c) Since there is no capacity at the existing Carbon Adsorption System (CAS), a new Concentrator and a retrofitting of the existing CAS by expanding the carbon beds has been evaluated to control fugitive VOCs around the extractors only (Extractor Pan Filter Changes, Extractor Pan Sampling Lines, QC Lab & Operator Checks, Extractor Pan Lid Opening - Web Breaks, Oven Opening - Web Breaks, Oven Cycling and Shutdown/Extractor Pan Cleanout):

<b>CASE 1C - COST ANALYSIS</b>			
<b>DIRECT COST (Pollution Control Equipment)</b>		<b>Unit Cost</b>	<b>TOTAL (\$)</b>
Direct Purchased Equipment			
	(a) Equipment Total (A) 25,000 cfm Concentrator, retrofit CAS to handle all exhaust, boiler for carbon bed desorption and heating spaces, cooling tower for carbon bed, building expansion for carbon beds, air stripper for carbon bed desorb water, containment areas, building modification.		\$1,825,000
	(b) Ductwork		150,000
		A	1,975,000
	Instruments	0.10 A	\$197,500
	Sales Taxes	0.03 A	\$59,250
	Freight	0.05 A	\$98,750
Total Equipment Costs (PE),		PE =	\$2,133,000
<b>Direct Installation Costs (DI)</b>			
	Foundation and Supports	0.08 (PE)	\$ 170,640
	Handling and Erection	0.14 (PE)	298,620
	Electrical	0.04 (PE)	85,320
	Piping	0.02 (PE)	42,660
	Insulation	0.01 (PE)	21,330
	Painting	0.01 (PE)	21,330
Total Direct Installation Costs		DI Total	\$639,900
<b>TOTAL Direct Cost = (Total Equipment Cost + Total Direct Installation Cost)</b>		(PE + DI)= DC Total	\$2,772,900
<b>Indirect Installation Costs (IC)</b>			
	Engineering	0.10 (PE)	\$213,300
	Contractor Fees	0.10 (PE)	\$213,300
	Construction and Field Expenses	0.05 (PE)	\$106,650
	Start-up	0.02 (PE)	\$42,660
	Performance Test	0.01 (PE)	\$21,330
	Contingencies	0.03 (PE)	\$63,990
<b>Total Indirect Installation Costs (IC Total)</b>		IC Total =	\$661,230
<b>TOTAL CAPITAL INVESTMENT (TCI) = (DC + IC)</b>		TCI Total =	<b>\$3,434,130</b>

<b>CASE 1C - COST ANALYSIS</b>			
<b>ANNUAL OPERATION &amp; MAINTENANCE</b>			
Direct Annual Costs (DA)			
	Operating Labor (2 hr/shift x 3 shifts/day (30 \$/hr)		\$65,700
	Supervisory Labor (15% of Operating Labor)		\$9,855
	Maintenance Labor (2 hr/shift x 3 shifts/day (35 \$/hr)		\$76,650
	Maintenance Materials (100% of Maintenance Labor)		\$76,650
	Utility Costs		
	Electricity	\$0.059/kW-hr	23,000
	Natural Gas (Auxiliary Fuel)	\$8.00/MMBtu	125,000
	Water and waste water treatment		50,000
	Materials and replacement (carbon media)		15,000
<b>Total Direct Operating Costs (DA)</b>		<b>DA =</b>	<b>\$441,855</b>
Indirect Annual Costs (IA)			
	Overhead	60% of Sum of Operating, Supervisory & Maintenance Labor and Maintenance Materials	\$137,313
	Administrative Costs	0.02 TCI	\$68,683
	Property Tax	0.01 TCI	\$34,341
	Insurance	0.01 TCI	\$34,341
	Capital Recovery Factor (system) = 0.1424 x TCI (using 7% compound interest rate and system useful life of 10 years)		\$489,020
<b>Total Indirect Operating Costs (IA)</b>		<b>IA =</b>	<b>\$763,698</b>
<b>Total Annualized Cost (Capital and O &amp; M Cost (DA + IA) )</b>		<b>TOC =</b>	<b>\$1,205,553</b>
Tons of Leaks TCE emissions =			45.86
Tons of Leaks TCE emissions Removed at 96% CAS control =			44.03
Cost per Ton TCE Removed =			<b>\$27,380</b>

**Case 1D- Adding a New Concentrator and Retrofitting (Expanding Carbon Beds) Existing CAS to Control Leaks VOC Emissions Plant-wide**

(d) A new Concentrator and retrofitting the existing CAS by expanding the carbon beds has been evaluated to control leaks of VOC emissions Plant-wide:

<b>CASE 1D - COST ANALYSIS</b>			
<b>DIRECT COST (Pollution Control Equipment)</b>		<b>Unit Cost</b>	<b>TOTAL (\$)</b>
Direct Purchased Equipment			
	(a) Equipment Total (A) 50,000 cfm Concentrator, retrofit CAS to handle all exhaust, boiler for carbon bed desorption and heating spaces, cooling tower for carbon bed, building expansion for carbon beds, air stripper for carbon bed desorb water, containment areas, building modification, airlocks, chilling equipent for air conditioning operator areas.		\$3,705,000
	(b) Ductwork		300,000
		A	4,005,000
	Instruments	0.10 A	\$400,500
	Sales Taxes	0.03 A	\$120,150
	Freight	0.05 A	\$200,250
	<b>Total Equipment Costs (PE),</b>	<b>PE =</b>	<b>\$4,725,900</b>
<b>Direct Installation Costs (DI)</b>			
	Foundation and Supports	0.08 (PE)	\$378,072
	Handling and Erection	0.14 (PE)	661,626
	Electrical	0.04 (PE)	189,036
	Piping	0.02 (PE)	94,518
	Insulation	0.01 (PE)	47,259
	Painting	0.01 (PE)	47,259
	<b>Total Direct Installation Costs</b>	<b>DI Total</b>	<b>1,417,770</b>
	<b>TOTAL Direct Cost = (Total Equipment Cost + Total Direct Installation Cost)</b>	<b>(PE + DI)= DC Total</b>	<b>\$6,143,670</b>
<b>Indirect Installation Costs (IC)</b>			
	Engineering	0.10 (PE)	\$472,590
	Contractor Fees	0.10 (PE)	\$472,590
	Construction and Field Expenses	0.05 (PE)	\$236,295
	Start-up	0.02 (PE)	\$94,518
	Performance Test	0.01 (PE)	\$47,259
	Contingencies	0.03 (PE)	\$141,777
	<b>Total Indirect Installation Costs (IC Total)</b>	<b>IC Total =</b>	<b>\$1,465,629</b>
	<b>TOTAL CAPITAL INVESTMENT (TCI) = (DC +IC)</b>	<b>TCI Total =</b>	<b>\$7,608,699</b>
<b>ANNUAL OPERATION &amp; MAINTENANCE</b>			

<b>CASE 1D - COST ANALYSIS</b>			
<b>Direct Annual Costs (DA)</b>			
	Operating Labor (2 hr/shift x 3 shifts/day (30 \$/hr)		\$65,700
	Supervisory Labor (15% of Operating Labor)		\$9,855
	Maintenance Labor (2 hr/shift x 3 shifts/day (35 \$/hr)		\$76,650
	Maintenance Materials (100% of Maintenance Labor)		\$76,650
	Utility Costs		
	Electricity	\$0.059/kW-hr	30,000
	Natural Gas (Auxiliary Fuel)	\$8.00/MMBtu	200,000
	Water and waste water treatment		75,000
	Materials and replacement (carbon media)		15,000
<b>Total Direct Operating Costs (DA)</b>			<b>DA = \$548,855</b>
<b>Indirect Annual Costs (IA)</b>			
	Overhead	60% of Sum of Operating, Supervisory & Maintenance Labor and Maintenance Materials	\$137,313
	Administrative Costs	0.02 TCI	\$152,174
	Property Tax	0.01 TCI	\$76,087
	Insurance	0.01 TCI	\$76,087
	Capital Recovery Factor (system) = 0.1424 x TCI (using 7% compound interest rate and system useful life of 10 years)		\$1,083,479
<b>Total Indirect Operating Costs (IA)</b>			<b>IA = \$1,525,140</b>
<b>Total Annualized Cost (Capital and O &amp; M Cost (DA + IA) )</b>			<b>TOC = \$2,073,995</b>
Tons of Fugitive TCE =			162.9
Tons of Fugitive TCE Removed at 96% CAS control =			156.47
Cost per Ton TCE Removed =			<b>\$13,255</b>

**CASE 2 - Installing a Totally New Control (CAS) System**

**Case 2A - Installing a New CAS with No Concentrator to Control Leaks VOC Emissions Around Extractors**

- (a) **Case 2A - Installing a New CAS with No Concentrator** - The following table reflects the installation of a new CAS with no concentrator to control fugitive VOCs from around the extractors only (Extractor Pan Filter Changes, Extractor Pan Sampling Lines, QC Lab & Operator Checks, Extractor Pan Lid Opening - Web Breaks, Oven Opening - Web Breaks, Oven Cycling and Shutdown/Extractor Pan Cleanout):

<b>CASE 2A - COST ANALYSIS</b>			
<b>DIRECT COST (Pollution Control Equipment)</b>		<b>Unit Cost</b>	<b>TOTAL (\$)</b>
Direct Purchased Equipment			
	(a) Equipment Total (A) 25,000 cfm, boiler for carbon bed desorption and heating spaces, cooling tower for carbon bed, air stripper for carbon bed desorb water, containment areas, building modification.		\$2,915,000
	(b) Ductwork		150,000
		A	3,065,000
	Instruments	0.10 A	\$306,500
	Sales Taxes	0.03 A	\$91,950
	Freight	0.05 A	\$153,250
Total Equipment Costs (PE),		PE =	\$3,616,700
<b>Direct Installation Costs (DI)</b>			
	Foundation and Supports	0.08 (PE)	\$ 289,336
	Handling and Erection	0.14 (PE)	506,338
	Electrical	0.04 (PE)	144,668
	Piping	0.02 (PE)	72,334
	Insulation	0.01 (PE)	36,167
	Painting	0.01 (PE)	36,167
Total Direct Installation Costs		DI Total	\$1,085,010
<b>TOTAL Direct Cost = (Total Equipment Cost + Total Direct Installation Cost)</b>		(PE + DI)= DC Total	\$4,701,710
<b>Indirect Installation Costs (IC)</b>			
	Engineering	0.10 (PE)	\$361,670
	Contractor Fees	0.10 (PE)	\$361,670
	Construction and Field Expenses	0.05 (PE)	\$180,835
	Start-up	0.02 (PE)	\$72,334
	Performance Test	0.01 (PE)	\$36,167
	Contingencies	0.03 (PE)	\$108,501
<b>Total Indirect Installation Costs (IC Total)</b>		IC Total =	\$1,121,177
<b>TOTAL CAPITAL INVESTMENT (TCI) = (DC + IC)</b>		<b>TCI Total =</b>	<b>\$5,822,887</b>
<b>ANNUAL OPERATION &amp; MAINTENANCE</b>			
Direct Annual Costs (DA)			
	Operating Labor (2 hr/shift x 3 shifts/day (30 \$/hr)		\$65,700
	Supervisory Labor (15% of Operating Labor)		\$9,855
	Maintenance Labor (2 hr/shift x 3 shifts/day (35 \$/hr)		\$76,650
	Maintenance Materials (100% of Maintenance Labor)		\$76,650

<b>CASE 2A - COST ANALYSIS</b>			
	Utility Costs		
	Electricity	\$0.059/kW-hr	23,000
	Natural Gas (Auxiliary Fuel)	\$8.00/MMBtu	125,000
	Water and waste water treatment		50,000
	Materials and replacement (carbon media)		15,000
<b>Total Direct Operating Costs (DA)</b>		<b>DA =</b>	<b>\$441,855</b>
<b>Indirect Annual Costs (IA)</b>			
	Overhead	60% of Sum of Operating, Supervisory & Maintenance Labor and Maintenance Materials	\$137,313
	Administrative Costs	0.02 TCI	\$116,458
	Property Tax	0.01 TCI	\$58,229
	Insurance	0.01 TCI	\$58,229
	Capital Recovery Factor (system) = 0.1424 x TCI (using 7% compound interest rate and system useful life of 10 years)		\$829,179
Total Indirect Operating Costs (IA)		<b>IA =</b>	<b>\$1,199,408</b>
<b>Total Annualized Cost (Capital and O &amp; M Cost (DA + IA) )</b>		<b>TOC =</b>	<b>\$1,641,263</b>
Tons of Fugitive TCE = 45.86			
Tons of Fugitive TCE Removed at 96% CAS control = 44.03			
Cost per Ton TCE Removed = <b>\$37,276</b>			

**Case 2B - Installing a New CAS with No Concentrator to Control Fugitive VOCs Plant-wide**

(b) **Case 2B - Installing a New CAS with No Concentrator to Control Fugitive VOCs Plant-wide** - The following table reflects the installation of a new CAS with no concentrator to control fugitive VOCs plant-wide

<b>CASE 2B - COST ANALYSIS</b>			
<b>DIRECT COST (Pollution Control Equipment)</b>		<b>Unit Cost</b>	<b>TOTAL (\$)</b>
Direct Purchased Equipment			
	(a) Equipment Total (A) 50,000 cfm boiler for carbon bed desorption and heating spaces, cooling tower for carbon bed, air stripper for carbon bed desorb water, containment areas, building modification, airlocks, chilling equipment for air conditioning operator areas.		\$4,255,000
	(b) Ductwork		300,000
		A	4,555,000
	Instruments	0.10 A	\$455,500
	Sales Taxes	0.03 A	\$136,650
	Freight	0.05 A	\$227,750

<b>CASE 2B - COST ANALYSIS</b>			
Total Equipment Costs (PE),		PE =	\$5,374,900
<b>Direct Installation Costs (DI)</b>			
	Foundation and Supports	0.08 (PE)	\$ 429,992
	Handling and Erection	0.14 (PE)	752,486
	Electrical	0.04 (PE)	214,996
	Piping	0.02 (PE)	107,498
	Insulation	0.01 (PE)	53,749
	Painting	0.01 (PE)	53,749
Total Direct Installation Costs		DI Total	\$1,612,470
<b>TOTAL Direct Cost = (Total Equipment Cost + Total Direct Installation Cost)</b>		(PE + DI)= DC Total	\$6,987,370
<b>Indirect Installation Costs (IC)</b>			
	Engineering	0.10 (PE)	\$537,490
	Contractor Fees	0.10 (PE)	\$537,490
	Construction and Field Expenses	0.05 (PE)	\$268,745
	Start-up	0.02 (PE)	\$107,498
	Performance Test	0.01 (PE)	\$53,749
	Contingencies	0.03 (PE)	\$161,247
<b>Total Indirect Installation Costs (IC Total)</b>		IC Total =	\$1,666,219
<b>TOTAL CAPITAL INVESTMENT (TCI) = (DC +IC)</b>		<b><u>TCI Total =</u></b>	<b><u>\$8,653,589</u></b>
<b>ANNUAL OPERATION &amp; MAINTENANCE</b>			
Direct Annual Costs (DA)			
	Operating Labor (2 hr/shift x 3 shifts/day (30 \$/hr)		\$65,700
	Supervisory Labor (15% of Operating Labor)		\$9,855
	Maintenance Labor (2 hr/shift x 3 shifts/day (35 \$/hr)		\$76,650
	Maintenance Materials (100% of Maintenance Labor)		\$76,650
	Utility Costs		
	Electricity	\$0.059/kW-hr	30,000
	Natural Gas (Auxiliary Fuel)	\$8.00/MMBtu	200,000
	Water and waste water treatment		75,000
	Materials and replacement (carbon media)		15,000
<b>Total Direct Operating Costs (DA)</b>		DA =	<b><u>\$548,855</u></b>
<b>Indirect Annual Costs (IA)</b>			
	Overhead	60% of Sum of Operating, Supervisory & Maintenance Labor and Maintenance Materials	\$137,313
	Administrative Costs	0.02 TCI	\$173,072
	Property Tax	0.01 TCI	\$86,536
	Insurance	0.01 TCI	\$86,536

<b>CASE 2B - COST ANALYSIS</b>			
	Capital Recovery Factor (system) = 0.1424 x TCI (using 7% compound interest rate and system useful life of 10 years)		\$1,232,271
Total Indirect Operating Costs (IA)		IA =	\$1,715,728
<b>Total Annualized Cost (Capital and O &amp; M Cost (DA + IA) )</b>		<b>TOC =</b>	<b>\$2,264,583</b>
Tons of Fugitive TCE =			162.99
Tons of Fugitive TCE Removed at 96% CAS control =			156.47
Cost per Ton TCE Removed =			<b>\$14,473</b>

**Case 2C - New Concentrator and New Carbon Adsorption System (CAS)**

- (a) **Case 2C Installing a New Concentrator and New Carbon Adsorption System**  
 - The following table reflects the installation of a new concentrator and a new CAS to control fugitive VOCs around the extractors only (Extractor Pan Filter Changes, Extractor Pan Sampling Lines, QC Lab & Operator Checks, Extractor Pan Lid Opening - Web Breaks, Oven Opening - Web Breaks, Oven Cycling and Shutdown/Extractor Pan Cleanout):

<b>CASE 2C - COST ANALYSIS</b>			
<b>DIRECT COST (Pollution Control Equipment)</b>		<b>Unit Cost</b>	<b>TOTAL (\$)</b>
Direct Purchased Equipment			
	(a) Equipment Total (A) 25,000 cfm Concentrator, Carbon Adsorber, boiler for CAS desorption and heating spaces, cooling tower for carbon bed, air stripper for carbon bed desorb water, containment areas building modifications, (b) Ductwork		\$1,965,000
			150,000
		A	2,115,000.00
	Instruments	0.10 A	\$211,500
	Sales Taxes	0.03 A	\$63,450
	Freight	0.05 A	\$105,750
Total Equipment Costs (PE),		PE =	\$2,495,700
<b>Direct Installation Costs (DI)</b>			
	Foundation and Supports	0.08 (PE)	\$ 199,656
	Handling and Erection	0.14 (PE)	349,398
	Electrical	0.04 (PE)	99,828
	Piping	0.02 (PE)	50,000
	Insulation	0.01 (PE)	25,000
	Painting	0.01 (PE)	25,000
Total Direct Installation Costs		DI Total	\$748,882
<b>TOTAL Direct Cost = (Total Equipment Cost + Total Direct Installation Cost)</b>		(PE + DI)= DC Total	\$3,244,582
<b>Indirect Installation Costs (IC)</b>			
	Engineering	0.10 (PE)	\$249,570

<b>CASE 2C - COST ANALYSIS</b>			
	Contractor Fees	0.10 (PE)	\$249,570
	Construction and Field Expenses	0.05 (PE)	\$124,785
	Start-up	0.02 (PE)	\$49,914
	Performance Test	0.01 (PE)	\$24,957
	Contingencies	0.03 (PE)	\$74,871
<b>Total Indirect Installation Costs (IC Total)</b>		<b>IC Total =</b>	<b>\$773,667</b>
<b>TOTAL CAPITAL INVESTMENT (TCI) = (DC +IC)</b>		<b><u>TCI Total =</u></b>	<b><u>\$4,018,249</u></b>
<b>ANNUAL OPERATION &amp; MAINTENANCE</b>			
Direct Annual Costs (DA)			
	Operating Labor (2 hr/shift x 3 shifts/day (30 \$/hr)		\$65,700
	Supervisory Labor (15% of Operating Labor)		\$9,855
	Maintenance Labor (2 hr/shift x 3 shifts/day (35 \$/hr)		\$76,650
	Maintenance Materials (100% of Maintenance Labor)		\$76,650
	Utility Costs		
	Electricity	\$0.059/kW-hr	23,000
	Natural Gas (Auxiliary Fuel)	\$8.00/MMBtu	125,000
	Water and waste water treatment		50,000
	Materials and replacement (carbon media)		15,000
<b>Total Direct Operating Costs (DA)</b>		<b><u>DA =</u></b>	<b><u>\$441,855</u></b>
<b>Indirect Annual Costs (IA)</b>			
	Overhead	60% of Sum of Operating, Supervisory & Maintenance Labor and Maintenance Materials	\$137,313
	Administrative Costs	0.02 TCI	\$80,365
	Property Tax	0.01 TCI	\$40,182
	Insurance	0.01 TCI	\$40,182
	Capital Recovery Factor (system) = 0.1424 x TCI (using 7% compound interest rate and system useful life of 10 years)		\$572,198
<b>Total Indirect Operating Costs (IA)</b>		<b><u>IA =</u></b>	<b><u>\$870,240</u></b>
<b>Total Annualized Cost (Capital and O &amp; M Cost (DA + IA) )</b>		<b><u>TOC =</u></b>	<b><u>\$1,312,095</u></b>
Tons of Fugitive TCE =			45.86
Tons of Fugitive TCE Removed at 96% CAS control =			44.03
Cost per Ton TCE Removed =			<b>\$29,800</b>

**Case 2D - New Concentrator and New Carbon Adsorption System (CAS) to control Fugitive Emission Plant-wide**

(a) **Case 2D Installing a New Concentrator and New Carbon Adsorption System to Control Fugitive VOCs Plant-wide** - The following table reflects the installation of a new CAS and new concentrator to control fugitive VOCs plant-wide:

<b>CASE 2D - COST ANALYSIS</b>			
<b>DIRECT COST (Pollution Control Equipment)</b>		<b>Unit Cost</b>	<b>TOTAL (\$)</b>
Direct Purchased Equipment			
	(a) Equipment Total (A) 50,000 Concentrator, new Carbon Adsorber, boiler for CAS desorption and heating spaces, cooling tower for carbon bed, air stripper for carbon bed desorb water, containment areas building modifications,		\$3,905,000
	(b) Ductwork		300,000
		A	4,205,000
	Instruments	0.10 A	\$420,500
	Sales Taxes	0.03 A	\$126,150
	Freight	0.05 A	\$210,250
	<b>Total Equipment Costs (PE),</b>	<b>PE =</b>	<b>\$4,961,900</b>
<b>Direct Installation Costs (DI)</b>			
	Foundation and Supports	0.08 (PE)	\$ 396,952
	Handling and Erection	0.14 (PE)	694,670
	Electrical	0.04 (PE)	198,476
	Piping	0.02 (PE)	99,238
	Insulation	0.01 (PE)	46,619
	Painting	0.01 (PE)	46,619
	<b>Total Direct Installation Costs</b>	<b>DI Total</b>	<b>\$1,488,574</b>
	<b>TOTAL Direct Cost = (Total Equipment Cost + Total Direct Installation Cost)</b>	<b>(PE + DI)= DC Total</b>	<b>\$6,450,474</b>
<b>Indirect Installation Costs (IC)</b>			
	Engineering	0.10 (PE)	\$496,190
	Contractor Fees	0.10 (PE)	\$496,190
	Construction and Field Expenses	0.05 (PE)	\$248,095
	Start-up	0.02 (PE)	\$99,238
	Performance Test	0.01 (PE)	\$49,619
	Contingencies	0.03 (PE)	\$148,857
	<b>Total Indirect Installation Costs (IC Total)</b>	<b>IC Total =</b>	<b>\$1,538,189</b>
	<b>TOTAL CAPITAL INVESTMENT (TCI) = (DC +IC)</b>	<b>TCI Total =</b>	<b>\$7,988,663</b>

<b>CASE 2D - COST ANALYSIS</b>			
<b>ANNUAL OPERATION &amp; MAINTENANCE</b>			
Direct Annual Costs (DA)			
	Operating Labor (2 hr/shift x 3 shifts/day (30 \$/hr)		\$65,700
	Supervisory Labor (15% of Operating Labor)		\$9,855
	Maintenance Labor (2 hr/shift x 3 shifts/day (35 \$/hr)		\$76,650
	Maintenance Materials (100% of Maintenance Labor)		\$76,650
	Utility Costs		
	Electricity	\$0.059/kW-hr	30,000
	Natural Gas (Auxiliary Fuel)	\$8.00/MMBtu	200,000
	Water and waste water treatment		75,000
	Materials and replacement (carbon media)		15,000
<b>Total Direct Operating Costs (DA)</b>		<u>DA =</u>	<b><u>\$548,855</u></b>
<b>Indirect Annual Costs (IA)</b>			
	Overhead	60% of Sum of Operating, Supervisory & Maintenance Labor and Maintenance Materials	\$137,313
	Administrative Costs	0.02 TCI	\$159,773
	Property Tax	0.01 TCI	\$79,887
	Insurance	0.01 TCI	\$79,887
	Capital Recovery Factor (system) = 0.1424 x TCI (using 7% compound interest rate and system useful life of 10 years)		\$1,137,586
<b>Total Indirect Operating Costs (IA)</b>		<u>IA =</u>	<b><u>\$872,493</u></b>
<b>Total Annualized Cost (Capital and O &amp; M Cost (DA + IA) )</b>		<b><u>TOC =</u></b>	<b><u>\$1,686,443</u></b>
Tons of Fugitive TCE =			162.99
Tons of Fugitive TCE Removed at 96% CAS control =			156.47
Cost per Ton TCE Removed =			<b>\$10,778</b>

As shown above, the cost effectiveness of retrofitting the existing CAS and adding a new concentrator to capture the leaks of VOC emissions around the extractors is \$27,380 and to control the leaks of VOC emissions plant-wide is \$13,255. The cost effectiveness of adding a new control system with or without a concentrator ranges from \$10,778 to \$37,276. Each of these add-on control options is cost prohibitive.

(c) **Leak Detection and Repair (LDAR Program):**

Since an add-on control option to control VOC emissions from leaks is cost prohibitive, LDAR has been evaluated as another alternative control option.

LDAR is a work practice designed to identify leaking equipment so that emissions from leaks can be reduced through timely repairs. EPA has determined that leaking equipment, such as valves, pumps, and connectors, are the largest source of emissions of volatile organic compounds (VOCs) and volatile hazardous air pollutants. The major cause of emissions from valves and connectors is seal or gasket failure due to normal wear or improper maintenance. Previous EPA studies estimated that valves and

connectors account for more than 90% of emissions from leaking equipment with valves being the most significant source.

The LDAR program includes the following elements:

- (1) Written LDAR program - The written LDAR Program shall specify the source's specific procedure for recordkeeping, certifications, monitoring and repair
- (2) Training - The training programs can vary according to the level of involvement and degree of responsibility of LDAR personnel.
- (3) LDAR audits - The audits shall check that the correct equipment is being monitored, LDAR program procedures are being followed, leaks are being fixed and the required records are being kept.
- (4) Contractor accountability - The LDAR program shall describe oversight procedures to increase the accountability of contractors.
- (5) Internal leak definition - The LDAR program shall include the internal leak definition applicable to equipment in trichloroethylene (TCE) service
- (6) More frequent monitoring - To ensure that leaks are still being identified in a timely manner and that previously unidentified leaks are not worsening over time, implement a plan for more frequent monitoring for components that contribute most to equipment leak emissions.
- (7) First attempt at repair - Time frames and practices must be established for first attempt at repairing components to stop detected leaks while still small,
- (8) Delay of repair compliance assurance - Any component that cannot be repaired during the specified repair interval must be placed on a "Delay of Repair" list to be repaired during the next shutdown cycle. Delay of repair compliance assurance procedures ensure that the appropriate equipment is justifiably on the "Delay of Repair" list and that facilities have a plan to fix these components.
- (9) Electronic monitoring and storage of data - Maintenance of an electronic database for storing and reporting LDAR data and use of data loggers or other data collection devices during all LDAR monitoring.
- (10) QA/QC of LDAR data - A procedure to ensure QA/QC review of all data generated by LDAR monitoring..
- (11) Calibration drift assessment - Calibration of LDAR monitoring equipment using an appropriate calibration gas, in accordance with 40 CFR Part 60, EPA Reference Test Method 21.
- (12) Records of maintenance - Organized and readily available records must be maintained for the LDAR program.

Currently, Daramic is implementing an LDAR program as part of the EPA consent order for all equipment in trichloroethylene service (i.e., containing more than 5% trichloroethylene and in service more than 300 hours per calendar year) consistent with 40 CFR 63, Subpart H (National Emission Standards for Organic Hazardous Air Pollutants (NESHAP) for Equipment Leaks).

The LDAR program is currently being implemented to existing equipment. Since this program is currently implemented, it is, therefore, technically feasible and no cost analysis is necessary as part of this BACT analysis. Therefore, LDAR technology will be evaluated for further consideration in this BACT analysis.

**STEP 5 -Select BACT**

The following table presents a summary of recent BACT evaluations for battery separator production:

Company / Location	Reference (Year Issued)	Process Description	BACT Emission Limits / Requirements
<b>Current BACT:</b>  Daramic, LLC IN	SSM 061-32841-00012, issued on June 17, 2014	Manufacturing of Battery Separators 100 million meters squared production per year	(1) Continued implementation of LDAR to equipment and component leaks equipment that contains organic hazardous air pollutant  (2) Control of VOC/TCE from SM Lines 4 and 6 by the same CAS with control efficiency of 98% and outlet emissions limit of 23.1 pounds per hour.
<b>IDEM Proposed BACT:</b> Daramic, LLC IN	Proposed	Manufacturing of Battery Separators 100 million meters squared production per year	(1) Continued implementation of LDAR to equipment and component leaks equipment that contains organic hazardous air pollutant  (2) Control of VOC/TCE from SM Lines 4 and 6 by the same CAS with control efficiency of 96% and outlet emissions limit of 46.2 pounds per hour.
Daramic, LLC, Owensboro, Kentucky	Title V No. V-11-031 November 21, 2011	Manufacturing of Battery Separators using n-hexane	Extractor Lines BACT Limits: Use of Carbon Bed Filters  Extractor Line 1 installed in 1969 and 2 installed in 1974 both controlled by Carbon Bed 1 with 96% adsorption/control efficiency. CAS installed in 1989, no BACT determination  Extractor Line 3 installed in 1990- Carbon Bed 2 adsorption/control efficiency PSD BACT limit of 98%  Extractor Line 4 -Carbon Bed 3 installed in 1995 adsorption/control efficiency limit of 96% minor limit to avoid PSD. No BACT determination.
Microporous Products, L.P. Tennessee	October 1, 2003	Manufacturing of Battery Separators 28.2 million meters squared production per year	1) Source-wide TCE losses not to exceed 160.0 tpy on a 12-month rolling basis (not a BACT determination)

Company / Location	Reference (Year Issued)	Process Description	BACT Emission Limits / Requirements
Enteck International, Oregon	OR TV Permit No. 22-6024 (February 22, 2011)	Manufacturing of Battery Separators	<p>All microporous production lines are controlled by 4 bed carbon adsorption system (CAS). Plant is maintained at negative pressure and exhaust air is vented into the CAS.</p> <p>CAS limit at 10 lbs/hr (daily average). Note: CAS is designed at 99.9% VOC control but control efficiency is not a limit)</p> <p>Conduct leak detection monitoring for equipment and component leaks.</p> <p>There is no BACT determination</p>
Daramic, LLC Tennessee	TN Permit No. 954966P (October 1, 2003)	Manufacturing of Battery Separators	There is no BACT determination for the Plastic battery mat production process. CAS was determined to be inherent to the process with TCE limit of 13,140 lbs/month.
Spartech Plastics, California	RBLC: CA-1107 364198 (March 24, 2000)	manufacturing of engineered thermoplastic sheet materials	There is no BACT determination for the facility's fugitive emissions.

As shown in this table, aside from Daramic, LLC, Indiana has only two sources with BACT requirements that use carbon adsorption systems (CAS) with one source limited to 10 pounds per hour of VOC emissions and the other source limited to control efficiencies of the CAS.

**Daramic, LLC, Kentucky -**

This source was originally under W. R. Grace in 1969. Extractor Line 3 was installed in 1990 and was limited to avoid PSD review. However, the limit was exceeded and the line went through PSD review in 2003. The PSD BACT required a limit of 98% adsorption/control efficiency for CAS 2. Another adsorber, CAS 3 has a limit of 96% adsorption/control efficiency and CAS 1 has an adsorption/control efficiency of 96%. Compliance is based on the monthly averaging of control efficiencies. There are no BACT determinations for CAS 1 or CAS 3. This source uses hexane in extracting oil from the extruded plastic sheet, while Daramic, LLC, Indiana uses TCE in extracting oil from the extruded plastic sheet.

**Entech International, Oregon -**

This source uses TCE in extracting oil from the extruded plastic sheet, similar to Daramic, LLC, Indiana. This source is twelve and a half (12.5) times the size of Daramic, LLC (75,000 acfm vs. 6,000 acfm). It has an emission limit of 10 pounds of VOC/TCE per hour. The entire plant is under negative pressure and is controlled by a 4-bed carbon adsorption system with a designed control efficiency of 99.9%. In addition, Entech conducts leak detection monitoring for equipment and component leaks. This VOC limit was not based on a BACT or PSD avoidance limit. IDEM, OAQ was told by an Oregon representative through an e-mail, dated March 7, 2013, that this limit was needed to meet the NAAQS.

**Daramic, LLC, Indiana -**

The BACT established in Significant Source Modification 061-32841-00012 and Part 70 Operating Permit Renewal 061-31760-00012 for Daramic, LLC, Indiana was based from Daramic's, Owensboro, Kentucky BACT, which was the most stringent among the comparable sources above. The BACT required that the carbon adsorption system (CAS) shall operate at a minimum control efficiency of no less than 98%, based on a 24-hour averaging time.

On November 14, 2014, Daramic submitted a comparison of Daramic's Corydon, Indiana and Owensboro, Kentucky Carbon Bed Adsorption Systems 2 (CAS2) and five years of daily average control efficiency data for CAS2 to IDEM. Based on this operating efficiency data, Daramic's, Owensboro, Kentucky Carbon Adsorber System 2 shows that the CAS2 was unable to continuously perform at a 98% control efficiency on a 24-hour average basis. Therefore, the data supported reducing the CAS minimum control efficiency to no less than 96% with compliance determined on a 24-hour basis.

No other changes to the BACT requirements are made in this permitting action. BACT re-evaluation is only for the purpose of reducing the CAS minimum control efficiency.

**IDEM, OAQ BACT Determination:**

Therefore, Daramic, LLC, Indiana's revised BACT under 326 IAC 8-1-6 shall be the following:

- (a) Pursuant to 326 IAC 8-1-6, the Permittee shall comply with the following BACT requirements:
  - (1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, Sub-Micro (SM) Line 4 and Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) shall be controlled by a Carbon Adsorption System (CAS) with an overall control efficiency of no less than ~~98~~ **96**%.
  - (2) The VOC emissions from the CAS stack (S/V ID # 17) shall not exceed ~~23.4~~ **46.2** pounds per hour.
  - (3) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID #9.4.
- (b) The VOC emissions from the evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4) when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the CAS. However, the control efficiency of ~~98~~ **96**% shall not apply due to the expected low inlet concentration.
- (c) The control efficiency of ~~98~~ **96**% shall not apply when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID #11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.
- (d) No add-on control for sources of fugitive VOC/TCE emissions.
- (e) The implementation of a leak detection and repair (LDAR) program for equipment leaks as follows:

- (1) The Permittee shall develop a written LDAR program requiring leak checks of all equipment in trichloroethylene service.
- (2) The LDAR program shall include the following elements:
  - (A) Written LDAR program - The written LDAR Program shall specify the source's specific procedure for recordkeeping, certifications, monitoring and repair.
  - (B) Training - The training programs can vary according to the level of involvement and degree of responsibility of LDAR personnel.
  - (C) LDAR audits - The audits shall check that the correct equipment is being monitored, LDAR program procedures are being followed, leaks are being fixed and the required records are being kept.
  - (D) Contractor accountability - The LDAR program shall describe oversight procedures to increase the accountability of contractors.
  - (E) Internal leak definition - The LDAR program shall include the internal leak definition applicable to equipment in trichloroethylene (TCE) service
  - (F) More frequent monitoring - To ensure that leaks are still being identified in a timely manner and that previously unidentified leaks are not worsening over time, implement a plan for more frequent monitoring for components that contribute most to equipment leak emissions.
  - (G) First attempt at repair - Time frames and practices must be established for first attempt at repairing components to stop detected leaks while still small.
  - (H) Delay of repair compliance assurance - Any component that cannot be repaired during the specified repair interval must be placed on a "Delay of Repair" list to be repaired during the next shutdown cycle. Delay of repair compliance assurance procedures ensure that the appropriate equipment is justifiably on the "Delay of Repair" list and that facilities have a plan to fix these components.
  - (I) Electronic monitoring and storage of data - Maintenance of an electronic database for storing and reporting LDAR data and use of data loggers or other data collection devices during all LDAR monitoring.
  - (J) QA/QC of LDAR data - A procedure to ensure QA/QC review of all data generated by LDAR monitoring.
  - (K) Calibration drift assessment - Calibration of LDAR monitoring equipment using an appropriate calibration gas, in accordance with 40 CFR Part 60, EPA Reference Test Method 21.
  - (L) Records of maintenance - Organized and readily available records must be maintained for the LDAR program.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

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

TO: Brian Thompson  
Daramic, LLC  
3430 Cline Rd  
Corydon, IN 47112-6908

DATE: July 9, 2015

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

SUBJECT: Final Decision  
Title V  
061-35655-00012

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:  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

July 9, 2015

TO: Corydon Public Library

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

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

**Applicant Name: Daramic LLC**  
**Permit Number: 061-35655-00012**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	CDENNY 7/9/2015 Daramic, LLC 061-35655-00012 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Brian Thompson Daramic, LLC 3430 Cline Rd Corydon IN 47112-6908 (Source CAATS)									
2		Steve Daino North American Sites Mgr Daramic, LLC 3430 Cline Rd Corydon IN 47112-6908 (RO CAATS)									
3		Harrison County Health Department 241 Atwood Street Ste#200 Corydon IN 47112-1882 (Health Department)									
4		Corydon Town Council 113 N. Oak St. Corydon IN 47112 (Local Official)									
5		Corydon Public Library 117 West Beaver Street Corydon IN 47112 (Library)									
6		Harrison County Clerk 300 North Capital Ave Rm #203 Corydon IN 47112 (Local Official)									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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