Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for Silgan White Cap Corporation in Vanderburgh County

Part 70 Operating Permit Renewal No.: T 163-36869-00003

The Indiana Department of Environmental Management (IDEM) has received an application from Silgan White Cap Corporation located at 2201 West Maryland Street, Evansville, Indiana 47712 for a renewal of its Part 70 Operating Permit issued on December 29, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Silgan White Cap Corporation to continue to operate its existing source.

A copy of the permit application and IDEM's preliminary findings are available at:

Willard Library of Evansville
21 First Avenue
Evansville, IN 47710-1294

and

IDEM Southwest Regional Office
1120 N. Vincennes Avenue
P.O. Box 128
Petersburg, IN 47567-0128

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

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit

application, please contact IDEM at the address below. Please refer to permit number No. T 163-36869-00003 in all correspondence.

Comments should be sent to:

Ms. Renee Traivaranon
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5615
Or dial directly: (317) 234-5615
Fax: (317) 232-6749 attn: Renee Traivaranon
E-mail: Rtraivar@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Ms. Renee Traivaranon of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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DRAFT

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Silgan White Cap Corporation
2201 West Maryland Street
Evansville, Indiana 47712

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

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

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

Operation Permit No.: T 163-36869-00003	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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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)]

The Permittee owns and operates a stationary metal closures fabrication plant.

Source Address:	2201 West Maryland Street, Evansville, Indiana 47712
General Source Phone Number:	(812) 425-6221
SIC Code:	3499 (Fabricated Metal Products, Not Elsewhere Classified) 3466 (Crowns and Closures) 3411 (Metal Cans)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) metal can coating line, identified as Line 2701, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) roll coating operation; and

(2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.0 MMBtu/hour.

(b) One (1) metal can coating line, identified as Line 2702, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) roll coating operation; and

(2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.65 MMBtu/hour.

(c) One (1) metal can printing and coating line, identified as Line 2803, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) offset lithographic printing press, with a maximum usage of 3 pounds of ink per 1,000 sheets;

(2) One (1) roll coating operation; and

(3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 3.0 MMBtu/hour.

(d) One (1) metal can printing and coating line, identified as Line 2805, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1986, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) offset lithographic printing press, with a maximum usage of 3 pounds of ink per 1,000 sheets;

(2) One (1) roll coating operation; and

(3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 6.0 MMBtu/hour.

(e) One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day and 48 batches a day, using filters for particulate control, exhausting inside.

(f) One (1) parts washer, constructed in 1996, with a maximum usage of 2 gallons/hour of solvent, using no control and exhausting inside the building.

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

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

(a) One (1) natural gas-fired Bryan boiler, constructed in 1996, with a maximum heat input capacity of 0.45 MMBtu/hr.

(b) Natural gas-fired combustion sources, constructed in 1986, with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) Sixteen (16) Plastisol Line curing ovens, with maximum heat input capacities ranging from 0.45 to 5.2 MMBtu/hr;

(2) Eighteen (18) space heaters, each with a maximum heat input capacity of 0.17 MMBtu/hr;

(3) Three (3) rapid air units, each with a maximum heat input capacity of 7.435 MMBtu/hr, and one (1) rapid air unit with a maximum heat input capacity of 1.25 MMBtu/hr;

(4) One (1) mix room heater, with a maximum heat input capacity of 0.60 MMBtu/hr;

(5) One (1) Plastisol Line 4114 curing oven, with a maximum heat input capacity of 0.12 MMBtu/hr; and

(6) Four (4) cap manufacturing curing ovens (Press Lines), each with a maximum heat capacity of 0.8 MMBtu/hr.

(c) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; and

(2) Vessels storing lubricating oils, hydraulic oils, and machining fluids.

(d) Packaging lubricants and greases.

(e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38^{o}C (100^{o}F); or

(2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20^{o}C (68^{o}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(g) Heat exchanger cleaning and repair.

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(i) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Seven (7) scroll shears, constructed in 1970, each with a line speed of 24 metal sheets per minute, no control;

(2) Two (2) waxers;

(3) One (1) UV Printing Line, identified as UV-1-2804, with a maximum capacity of 4,800 sheets per hour, 3.3 pounds of ink per hour and no control; and

(4) Video jet printer on metal closures which it includes video jet inks and makeup fluid.

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T 163-36869-00003, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304**.**

(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]

(a) All terms and conditions of permits established prior to T 163-36869-00003 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

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

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

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

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(3) Any change in emissions; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.2 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.3 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.4 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.5 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.6 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

(c) For monitoring required by 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.

(d) 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 part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator 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.9 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.10 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.11 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.12 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

(l) 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:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

(II)

(a) CAM *Response to excursions or exceedances.*

(1) 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.

(2) 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.

(b) 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 significant 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.

(c) Based on the results of a determination made under paragraph (II)(a)(2) 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.

(d) 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).

(e) 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.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) 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:

(1) Failed to address the cause of the control device performance problems; or

(2) 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.

(g) 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.

(h) *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 paragraph (II)(c) 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

C.13 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.14 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(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 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(33) (“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.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

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

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

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

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, 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 plan 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.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) metal can coating line, identified as Line 2701, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) roll coating operation; and

(2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.0 MMBtu/hour.

(b) One (1) metal can coating line, identified as Line 2702, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) roll coating operation; and

(2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.65 MMBtu/hour.

(c) One (1) metal can printing and coating line, identified as Line 2803, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) offset lithographic printing press, with a maximum usage of 3 pounds of ink per 1,000 sheets;

(2) One (1) roll coating operation; and

(3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 3.0 MMBtu/hour.

(d) One (1) metal can printing and coating line, identified as Line 2805, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1986, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) offset lithographic printing press, with a maximum usage of 3 pounds of ink per 1,000 sheets;

(2) One (1) roll coating operation; and

(3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 6.0 MMBtu/hour.

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

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

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

In order to render 326 IAC 2-2 not applicable, the VOC emissions after control from the following four (4) metal can printing and coating lines shall not exceed 233.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month:

(a) Metal Can Coating Line 2701;
(b) Metal Can Coating Line 2702;
(c) Metal Can Printing and Coating Line 2803; and
(d) Metal Can Printing and Coating Line 2805.

This VOC limit includes combustion emissions from the curing ovens.

Compliance with the above limit, combined with the potential to emit VOC from all other emission units including cleanup solvent at the source shall limit VOC emissions from the entire source to less than 250 tons per year and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-3] [326 IAC 8-1-2]

(a) Pursuant to 326 IAC 8-2-3, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of two and eight-tenths (2.8) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at the roll coating operation on Line 2805.

(b) When non-compliance coating is used, the Permittee shall comply with the following:

(i) Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the roll coating operation on Line 2805 shall be less than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = \frac{L}{(1 - (L/D))}$$

Where
L =Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D =Density of VOC in coating in pounds per gallon of VOC;
E =Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

The equivalent emission limit as applied is equal to 4.52 pounds of VOC per gallon of coating solids. A solvent density of 7.36 pounds per gallon of VOC per gallon of coating be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2(a).

(ii) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the RTO shall be no less than the equivalent overall efficiency calculated by the following equation:

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

Where:

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

E =Equivalent emission limit in pounds of VOC per gallon of coating solids as applied = 4.52 lbs/gal coating solids

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

Based on this equation and a coating with a VOC content of 39.34 pounds per gallon of coating solids, the Permittee shall operate the RTO at an overall control efficiency of at least 88.5%

D.1.3 Hazardous Air Pollutants (HAP) Limitations

In order to render the source an area source, the Permittee shall comply with the following: HAP

(a) The single Hazardous Air Pollutant (HAP) emissions after control from the following 4 metal can printing and coating lines, shall not exceed 9.95 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

(1) Metal Can Coating Line 2701;
(2) Metal Can Coating Line 2702;
(3) Metal Can Printing and Coating Line 2803; and
(4) Metal Can Printing and Coating Line 2805.

(b) The combined Hazardous Air Pollutant (HAP) emissions after control from the following four (4) metal can printing and coating lines, shall not exceed 22.30 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(1) Metal Can Coating Line 2701;
(2) Metal Can Coating Line 2702;
(3) Metal Can Printing and Coating Line 2803; and
(4) Metal Can Printing and Coating Line 2805.

Compliance with the above limits, combined with the potential to emit HAP from all other emission units, including cleanup solvent, at the source, shall limit single HAP emitted from the entire source to less than ten (10) tons per year and any combination of HAPs emitted from the entire source to less than twenty-five (25) tons per year, and render the source an "area source" for HAP emissions.

These HAP limits include combustion emissions from the curing ovens.

D.1.4 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2]

(a) Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions of the curing ovens of the metal can coating lines 2701, 2702 and 2703 shall not exceed 0.8 lbs/MMBtu.

(b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions the curing oven of the metal can coating line 2805 shall not exceed 0.3163 lbs/MMBtu

The PM emission limit (from oven line 2805) was calculated using the following equation:

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
= 116.515 MMBtu/hr

Combustion Unit	Installation Date	Rating MMBtu/hr	Q MMBtu/hr
16 Plastisol Line curing ovens	1986	83.2	116.515
18 space heaters	1986	3.06	
3 rapid air units	1986	8.685	
mix room heater	1986	0.6	
Plastisol Line 4114 curing oven	1986	0.12	
Cap Manufacturing curing ovens	1986	3.2	
Line 2805 Curing Oven	1986	6.0	

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.6 Thermal Oxidizer Operation [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.1.1, D.1.2, and D.1.3, the Cannister RTO shall be in operation when the metal can printing and coating Lines 2701, 2702, 2803, or 2805 are in operation.

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) In order to demonstrate the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall conduct inlet and outlet VOC emissions testing to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) for the Cannister RTO, utilizing methods as approved by the Commissioner.

(b) In order to demonstrate the compliance status with Condition D.1.3, the Permittee shall perform HAP emissions testing at the outlet of the Cannister RTO, utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM.

Testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration utilizing methods as approved by the Commissioner. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC emissions limitation contained in Condition D.1.1, shall be determined using the following equations:

$$\text{VOC emissions} = \left[\sum(U_C \times C_{VOC}) \times (1.0 - DE \times CE) + \sum (U_C \times C_{VOC}) \times (1.0\text{-}CE)\right] / 2000 \text{ lbs/ton}$$

Where U_C = Coating usage, gal/month
C_{VOC} = VOC Content, lbs/gal coating, less water
DE = Destruction Efficiency, as determined during the most recent valid compliance demonstration
CE = Capture Efficiency, as determined during the most recent valid compliance demonstration

D.1.10 Hazardous Air Pollutants (HAPs)

Compliance with the HAP emission limitations contained in Condition D.1.3, shall be determined using the following equations:

$$S_H = \left[\sum (U_C \times C_{HAP}) \times (1.0 - DE \times CE) + \sum [\, U_C \times C_{HAP} \,] \times (1.0\text{-}CE)\right] / 2000 \text{ lbs/ton}$$

Where S_H = Single HAP emissions, tons/month
U_C = Coating usage, gals/month
C_{HAP} = Single HAP Content, lbs/gal coating
DE = Destruction Efficiency, as determined during the most recent valid compliance demonstration
CE = Capture Efficiency, as determined during the most recent valid compliance demonstration

$$\text{Combined HAPs} = \sum \text{Single HAP emissions}$$

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

D.1.11 Thermal Oxidizer Temperature [CAM]

Pursuant to 40 CFR 64:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the Cannister RTO for measuring operating temperature. For the purposes of this condition, continuous shall mean no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour rolling average.

(b) The Permittee shall determine the 3-hour rolling average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2 and D.1.3.

(c) On and after the date the stack test results are available, the Permittee shall operate the Cannister RTO at or above the 3-hour rolling average temperature as observed during the compliant stack test.

(d) A 3-hour rolling average temperature that is below temperature for the most recent valid compliance demonstration is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to

Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

D.1.12 Parametric Monitoring

Pursuant to 40 CFR 64:

(a) The Permittee shall record the duct pressure associated with operation of the thermal oxidizer at least once per day when the Cannister RTO is in operation. When for any one reading, the duct pressure is outside the normal range of -0.5 to –3.5 inches of water, or the duct pressure established by most recent valid compliance demonstration, the Permittee shall take reasonable response steps.

(b) A duct 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. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.

(c) The instrument used for determining the duct 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.

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

D.1.13 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 D.1.2, and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The amount of printing and roll coating material and solvent used on monthly basis:

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

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

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for roll coating for each day;

(5) The total single and combined HAPs usage for each month;

(6) The total VOC emissions for each day and each compliance period, and

(7) The total single and combined HAPs emissions for each compliance period.

(b) To document the compliance status with Condition D.1.11, the Permittee shall maintain continuous temperature records for the Cannister RTO and the 3-hour rolling average temperature used to demonstrate compliance during the most recent compliant stack test.

(c) To document the compliance status with Condition D.1.12, the Permittee shall maintain daily records of duct pressure for the Cannister RTO. The Permittee shall include in its daily record when a duct pressure reading is not taken and the reason for the lack of a reading (e.g. the process did not operate that day).

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

D.1.14 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days following the end of each quarter. 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 C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

SECTION D.2 EMISSION UNIT OPERATION CONDITIONS

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

(e) One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day and 48 batches a day, using filters for particulate control, exhausting inside.

(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 PM Limitations [326 IAC 6.5]

In order to render 326 IAC 6.5 not applicable, the PM emissions after control from the compound manufacturing operation shall not exceed 1.60 pounds per hour.

Compliance with the above limit, combined with the uncontrolled potential to emit PM from all other emission units at the source, shall limit actual PM emissions from the entire source to less than ten (10) tons per year, and render the requirements of 326 IAC 6.5 (PM Limitations Except Lake County) not applicable to this source.

D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the compound manufacturing operation shall not exceed 3.63 pounds per hour when operating at a process weight rate of 0.83 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (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.2.3 Preventive Maintenance Plan [326 IAC 2-7-5 (12)]

A Preventive Maintenance Plan is required for the compound manufacturing operation and the filters. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to preventive maintenance plans.

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

D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the filters for particulate control shall be in operation and controlling particulate, at all times when dry ingredients are being loaded and are in operation.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(f) One (1) parts washer, constructed in 1996, with a maximum usage of 2 gallons/hour of solvent, using no control and exhausting inside the building.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-2(a), the Permittee of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

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

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

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

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

(6) Store waste solvent only in closed containers.

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

(b) Pursuant to 326 IAC 8-3-2(b), the Permittee of a cold cleaner degreaser subject to this subsection 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.3.2 Volatile Organic Compounds (VOC) [326 8-3-8]

Effective January 1, 2015, the degreasing operation is subject to the requirements of 326 IAC 8-3-8. Pursuant to 326 IAC 8-3-8(a), the Permittee shall not operate a 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).

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 each of the following records for each purpose:

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

(2) The date of purchase (or invoice/bill date of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

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

(6) All records required by Condition D.3.3(a)(1) through (5) shall be:

(A) retained on-site or accessible electronically from the site for the most recent three (3) year period; and

(B) reasonably accessible for an additional two (2) year period.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(a) One (1) natural gas-fired Bryan boiler, constructed in 1996, with a maximum heat input capacity of 0.45 MMBtu/hr.

(b) Natural gas-fired combustion sources, constructed in 1986, with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) Sixteen (16) Plastisol Line curing ovens, with maximum heat input capacities ranging from 0.45 to 5.2 MMBtu/hr;

(2) Eighteen (18) space heaters, each with a maximum heat input capacity of 0.17 MMBtu/hr;

(3) Three (3) rapid air units, each with a maximum heat input capacity of 7.435 MMBtu/hr, and one (1) rapid air unit with a maximum heat input capacity of 1.25 MMBtu/hr;

(4) One (1) mix room heater, with a maximum heat input capacity of 0.60 MMBtu/hr;

(5) One (1) Plastisol Line 4114 curing oven, with a maximum heat input capacity of 0.12 MMBtu/hr; and

(6) Four (4) cap manufacturing curing ovens (Press Lines), each with a maximum heat capacity of 0.8 MMBtu/hr.

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

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

D.4.1 Particulate Emission Limitations for Sources of Indirect Heating [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 following units shall be limited as listed below:

Combustion Unit	Installation Date	Rating MMBtu/hr	Q MMBtu/hr	PM = Pt lb/MMBtu
16 Plastisol Line curing ovens	1986	83.2	116.515	0.3163
18 space heaters	1986	3.06		
3 rapid air units	1986	8.685		
mix room heater	1986	0.6		
Plastisol Line 4114 curing oven	1986	0.12		
Cap Manufacturing curing ovens	1986	3.2		
Line 2805 Curing Oven	1986	6.0		
Bryan Boiler	1996	0.45	116.965	0.3160

The PM emission limits were calculated using the following equation:

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Silgan White Cap Corporation
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712
Part 70 Permit No.: T 163-36869-00003

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: Silgan White Cap Corporation
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712
Part 70 Permit No.: T 163-36869-00003

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

□ This is an emergency as defined in 326 IAC 2-7-1(12) • The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and • The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Silgan White Cap Corporation
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712
Part 70 Permit No.: T 163-36869-00003
Facility: Four (4) metal can printing and coating lines 2701, 2702, 2803 and 2805
Parameter: VOC emissions after control
Limit: Shall not exceed 233.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Silgan White Cap Corporation
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712
Part 70 Permit No.: T 163-36869-00003
Facility: The single HAP emissions from the four (4) metal printing and coating lines
Parameter: Single HAP after control
Limit: Shall not exceed 9.95 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Silgan White Cap Corporation
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712
Part 70 Permit No.: T 163-36869-00003
Facility: The single HAP emissions from the four (4) metal can printing and coating lines
Parameter: Combined HAPs after control
Limit: Shall not exceed 22.30 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Silgan White Cap Corporation
Source Address: 2201 West Maryland Street, Evansville, Indiana 47712
Part 70 Permit No.: T 163-36869-00003

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

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	**Silgan White Cap Corporation**
Source Location:	**2201 West Maryland Street, Evansville, Indiana 47712**
County:	**Vanderburgh**
SIC Code:	**3499 (Fabricated Metal Products, Not Elsewhere Classified)** **3466 (Crowns and Closures)** **3411 (Metal Cans)**
Permit Renewal No.:	**T 163-36869-00003**
Permit Reviewer:	**Renee Traivaranon**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Silgan White Cap Corporation relating to the operation of a metal closures fabrication plant. On February 23, 2016, Silgan White Cap Corporation submitted an application to the OAQ requesting to renew its operating permit. Silgan White Cap Corporation was issued its second Part 70 Operating Permit Renewal T 163-30180-00003 on December 29, 2011.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

[The descriptions of the coating lines have been clarified to mean metal can coating lines.]

(a) One (1) metal can coating line, identified as Line 2701, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) roll coating operation; and

(2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.0 MMBtu/hour.

[The source confirmed that all the above units vent to the RTO.]

(b) One (1) metal can coating line, identified as Line 2702, with a maximum capacity of 5,100 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) roll coating operation; and

(2) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 4.65 MMBtu/hour.

[The source confirmed that all the above units vent to the RTO.]

(c) One (1) metal can printing and coating line, identified as Line 2803, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1970, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) offset lithographic printing press, with a maximum usage of 3 pounds of ink per 1,000 sheets;

(2) One (1) roll coating operation; and

(3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 3.0 MMBtu/hour.

[The source confirmed that all the above units vent to the RTO.]

(d) One (1) metal can printing and coating line, identified as Line 2805, with a maximum capacity of 4,200 metal sheets per hour, constructed in 1986, using a 6.0 MMBtu/hour natural gas-fired thermal oxidizer, identified as Cannister RTO as VOC control, exhausting to one (1) stack, identified as Cannister RTO stack, and consisting of the following equipment:

(1) One (1) offset lithographic printing press, with a maximum usage of 3 pounds of ink per 1,000 sheets;

(2) One (1) roll coating operation; and

(3) One (1) natural gas-fired curing oven, with a maximum heat input capacity of 6.0 MMBtu/hour.

[The source confirmed that all the above units vent to the RTO.]

(e) One (1) compound manufacturing operation (mixing and blending of oils and powders) , constructed in 2003, with a maximum capacity of 20 tons of plastisol per day and 48 batches a day, using filters for particulate control, exhausting inside.

(f) One (1) parts washer, constructed in 1996, with a maximum usage of 2 gallons/hour of solvent, using no control and exhausting inside the building.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

No emission units that were constructed and/or are operating without a permit during this renewal process.

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed from the source during this renewal process.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) One (1) natural gas-fired Bryan boiler, constructed in 1996, with a maximum heat input capacity of 0.45 MMBtu/hr.

[Constructed year is derived from the Appendix A calculations.]

(b) Natural gas-fired combustion sources, constructed in 1986, with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) Sixteen (16) Plastisol Line curing ovens, with maximum heat input capacities ranging from 0.45 to 5.2 MMBtu/hr;

(2) Eighteen (18) space heaters, each with a maximum heat input capacity of 0.17 MMBtu/hr;

(3) Three (3) rapid air units, each with a maximum heat input capacity of 7.435 MMBtu/hr, and one (1) rapid air unit with a maximum heat input capacity of 1.25 MMBtu/hr;

(4) One (1) mix room heater, with a maximum heat input capacity of 0.60 MMBtu/hr;

(5) One (1) Plastisol Line 4114 curing oven, with a maximum heat input capacity of 0.12 MMBtu/hr; and

[The description of the above unit was changed from burner to curing oven during this renewal process, because the source indicated that the plastisol (a soy oil blend) was applied to the outer edges of the cap for sealing, and then this sealant is cured in the oven. Therefore, this is a curing oven, not a burner.]

(6) Four (4) cap manufacturing curing ovens (Press Lines), each with a maximum heat capacity of 0.8 MMBtu/hr.

(c) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; and

(2) Vessels storing lubricating oils, hydraulic oils, and machining fluids.

(d) Packaging lubricants and greases.

(e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38^{o}C (100^{o}F); or

(2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20^{o}C (68^{o}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(g) Heat exchanger cleaning and repair.

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(i) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Seven (7) scroll shears, constructed in 1970, each with a line speed of 24 metal sheets per minute, no control;

(2) Two (2) waxers;

(3) One (1) UV Printing Line, identified as UV-1-2804, with a maximum capacity of 4,800 sheets per hour, 3.3 pounds of ink per hour and no control; and

(4) Video jet printer on metal closures which it includes video jet inks and makeup fluid.

Existing Approvals

Since the issuance of the Part 70 Operating Permit No. T163-36869-00003 on December 29, 2011, the source has been operating under the Significant Permit Modification No. T 163-31717-00003 issued on October 10, 2012

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending relating to this renewal application.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective October 27, 2011, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

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

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

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

(c) Other Criteria Pollutants
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Process/ Emission Unit	Unrestricted Potential To Emit of Renewal (tons/year)								
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
Roll Coating Operation - Line 2701	0	0	0	0	0	415.20	0	49.74	43.41 (MIBK)
Roll Coating Operation - Line 2702	0	0	0	0	0	415.20	0	49.74	43.41 (MIBK)
Roll Coating Operation - Line 2803	0	0	0	0	0	364.97	0	49.67	24.77 (MIBK)
Roll Coating Operation - Line 2804	0	0	0	0	0	364.97	0	44.57	43.41 (MIBK)
Lithographic Printing Press - Line 2803	0	0	0	0	0	1.13	0	negl	negl
Lithographic Printing Press - Line 2805	0	0	0	0	0	1.13	0	negl	negl
Curing ovens Lines 2701, 2702, 2803 and 2805***	0.15	0.59	0.59	0.05	7.73	0.43	6.49	0.14	0.15
Compound Manufacturing Operation	73.00	73.00	73.00	0	0	0	0	negl	negl
Parts Washer-Solvent Cleaning	0	0	0	0	0	8.76	0	negl	negl
Other Natural Gas Combustion Units	0.88	3.51	3.51	0.28	46.13	2.54	38.75	0.14	0.87
Scroll Shears	1.77	1.77	1.77	0	0	0	0	negl	negl
UV Ink Process - Line 2804	0	0	0	0	0	0.02	0	negl	negl

Process/ Emission Unit	Unrestricted Potential To Emit of Renewal (tons/year)								
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
Total PTE of Entire Source	**75.79**	**78.86**	**78.86**	**0.32**	**53.86**	**1,574.34**	**45.24**	**195.97**	**155.01 (**MIBK**)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
The PTE VOC were carried over from the T 163-30180-00003, Issued on December 29, 2011.
*** PTE from combustions only from use of natural gas, these emissions also route to RTO.

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

Greenhouse Gas (GHG) Emissions

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

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

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70

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

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
Process/ Emission Unit	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
Roll Coating Operation: Line 2701; Line 2702; Line 2803; and Line 2804	0	0	0	0	0	233.00(1)	0	22.30(2)	9.95(2)
Lithographic Printing Press - Line 2803	0	0	0	0	0		0		
Lithographic Printing Press - Line 2805	0	0	0	0	0		0		
Curing ovens Line 2701, 2702, 2803 and 2805(3)	0.15	0.59	0.59	0.05	7.73		6.49		
Compound Manufacturing Operation	7.00	7.00	7.00	0	0	0	0	negl	negl
Parts Washer-Solvent Cleaning	0	0	0	0	0	8.76	0	negl	negl
Other Natural Gas Combustion Units	0.88	3.51	3.51	0.28	46.13	2.54	38.75	0.14	0.87
Scroll Shears	1.77	1.77	1.77	0	0	0	0	negl	negl
UV Ink Process - Line 2804	0	0	0	0	0	0.02	0	negl	negl
Total PTE of Entire Source	**9.79**	**12.86**	**12.86**	**0.32**	**53.86**	**244.31**	**45.24**	**23.20**	**9.95**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
(1) This is an existing VOC Minor PSD Limit (326 IAC 2-2) for the source.
(2) This is an existing Minor HAPs Limit (40 CFR 63) for the source.
(3) Combustion emissions from the curing ovens are included in the PSD Minor limits.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is still greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is greater than twenty-five (25) tons per year. However, the Permittee has agreed to continue limiting the source's single HAP emissions and total HAP emissions as follows and render the source an "area source" of HAP emissions:

(1) The single Hazardous Air Pollutant (HAP) emissions after control from the following metal printing and coating lines shall not exceed 9.95 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

(a) Metal Can Coating Line 2701;
(b) Metal Can Coating Line 2702;
(c) Metal Can Printing and Coating Line 2803; and
(d) Metal Can Printing and Coating Line 2805.

(2) The combined Hazardous Air Pollutant (HAP) emissions after control from the above four (4) metal printing and coating lines, shall not exceed 22.30 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These HAP limits include combustion emissions from the curing ovens.

Compliance with the above limits, combined with the potential to emit HAP from all other emission units, including cleanup solvent at the source, shall limit single HAP emitted from the entire source to less than ten (10) tons per year and any combination of HAPs emitted from the entire source to less than twenty-five (25) tons per year, and shall render the source an "area source" of HAP emissions.

This is an existing limit for the source, but the limit was clarified to encompass emissions after control from the roll coating operations, curing ovens, ovens combustion, and offset lithographic printing presses, since all these units exhaust to the RTO. In addition, the cleanup solvent was removed from this limit. This change is necessary because all these units (not cleanup solvent) exhaust to the RTO.

(c) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because PSD regulated pollutant is limited to less than two hundred fifty (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).

In order to render 326 IAC 2-2 not applicable, the VOC emissions after control from the following four (4) metal printing and coating lines, shall not exceed 233.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month:

(a) Metal Can Coating Line 2701;
(b) Metal Can Coating Line 2702;
(c) Metal Can Printing and Coating Line 2803; and
(d) Metal Can Printing and Coating Line 2805.

This VOC limit includes combustion emissions from the curing ovens.

Compliance with the above limit, combined with the potential to emit VOC from all other emission units, including cleanup solvent at the source shall limit VOC emissions from the entire source to less than 250 tons per year and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

This is an existing limit for the source, but the limit was clarified to encompass emissions after control from the roll coating operations curing ovens, ovens combustion, offset lithographic printing presses, since all these units exhaust to the RTO. In addition, the cleanup solvent was removed from this limit. This change is necessary because all these units (not cleanup solvent) exhaust to the RTO.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Line 2701 (VOC)	RTO	Y	>100	<100	100	Y	N
Line 2701 (Single HAP)	RTO	Y	>10	<10	10	Y	N
Line 2701 (Total HAPs)	RTO	Y	>25	<25	25	Y	N
Line 2702 (VOC)	RTO	Y	>100	<100	100	Y	N
Line 2702 (Single HAP)	RTO	Y	>10	<10	10	Y	N
Line 2702 (Total HAPs)	RTO	Y	>25	<25	25	Y	N
Line 2803 (VOC)	RTO	Y	>100	<100	100	Y	N
Line 2803 (Single HAP)	RTO	Y	>10	<10	10	Y	N
Line 2803 (Total HAPs)	RTO	Y	>25	<25	25	Y	N
Line 2805 (VOC)	RTO	Y	>100	<100	100	Y	N
Line 2805 (Single HAP)	RTO	Y	>10	<10	10	Y	N
Line 2805 (Total HAPs)	RTO	Y	>25	<25	25	Y	N
Compound manufacturing operation (PM)	Filters	326 IAC 6-3-2	<100	-	100	N	-
Compound manufacturing operation (PM)	Filters	-	-	-	100	-	-
Ovens, Boiler, Heaters (PM/PM10/PM2.5)	None	-	-	-	100	-	-

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, continue to apply to the existing metal printing and coating lines 2701, 2702, 2803 and 2805 for VOC and HAPs for the Title V Renewal.

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units (326 IAC 12), are still not included in the permit for the natural gas-fired Bryan boiler, because the maximum heat input of this boiler is less than 10 MMBtu per hour.

(b) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modificaton commenced after July 23, 1984, are still not included in the permit for the storage tanks, because the maximum storage capacities of these storage tanks are less than 75 cubic meters (19,813 gallons).

(c) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 326 IAC 12 (40 CFR Part 60, Subpart QQ), are still not included in the permit for the two (2) offset lithographic printing presses (on Lines 2803 and 2805), because the presses are not rotogravure printing presses.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Paper and Other Web Coating (40 CFR Part 63, Subpart KK) (326 IAC 20) are still not included in the permit for the two (2) offset lithographic printing presses (on Lines 2803 and 2805), because the presses are not rotogravure or flexographic printing presses and this source is not a major for HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry (40 CFR Part 63, Subpart JJJJ) (326 IAC 20) are still not included in the permit for the two (2) offset lithographic printing presses (on Lines 2803 and 2805), because these sheet coating operations are not web coating lines as defined in 40 CFR 63.3310, and this source is not a major for HAPs by limiting the HAPs emissions.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM) (326 IAC 20) are still not included in the permit for the four (4) metal coating lines (on Lines 2701, 2702, 2803 and 2805), because this source is not a major for HAPs by limiting the HAPs emissions.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH) (326 IAC 20) are still not included in the permit for the four (4) metal coating lines (on Lines 2701, 2702, 2803 and 2805), because they do not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes, and they do not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP as defined in 40 CFR 40.11180.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (326 IAC 20) are not included in the permit for the Bryan boiler, because this boiler is located in a minor source for HAPs by limiting the HAPs emissions.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR Part 63, Subpart JJJJJJ) (326 IAC 20) are not included in the permit for the natural gas-fired Bryan boiler, because this boiler is considered the gas-fired boiler, as defined in 40 CFR 63.11237.

(g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Potential to Emit After Issuance above – PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of this source will continue to limit to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 will still not apply. (See also Potential to Emit After Issuance above – HAP section)

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2015, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6.5 PM Limitations Except Lake County
This 326 IAC 6.5 applies to a source located in Vanderburgh County, with its PM PTE more than 100 tons/year or its actual emissions of 10 tons/year or more.

This rule does not apply to this source because the source has chosen to limit its PM actual emissions to less than 10 tons/year. There is no need to limit the PM because it is already less than 100 tons/year.

(See also State Rule Applicability – Individual Facilities for the compound manufacturing operation.)

326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8, because it is not located in Lake County.

326 IAC 8-6 (Organic Solvent Emission Limitations)
This source is not subject to the requirements of 326 IAC 8-6 because the source commenced operation prior to October 7, 1974.

State Rule Applicability – Individual Facilities

Roll coating operations of Line 2701; Line 2702;Line 2803; and Line 2804.

326 IAC 8-2-3 (Can coating operations)

(a) The 326 IAC 8-2-3 requirements apply to any can coating operations (roll coating) which are constructed after 1980 and have PTE of VOC 25 tons/year or more.

The following table summarizes the applicability for the lines in this source.

Line No.	Constructed Date	PTE VOC (tons/yr)	Under 326 IAC 8-2-3 (Y/N)
Line 2701	constructed 1970	-	N
Line 2702	constructed 1970	-	N
Line 2803	constructed 1970	-	N
Line 2805	constructed 1986	>25	Y

Based on this, the roll coating operations of the metal can coating Lines 2701, 2702, 2803, are not subject to 326 IAC 8-2-3 because each line is constructed before 1980.

(b) The roll coating operation on metal can coating Line 2805 is subject to 326 IAC 8-2-3 because it was constructed after 1980 and the PTE of VOC is greater than 25 tons/yr.

(i) Pursuant to 326 IAC 8-2-3, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of two and eight-tenths (2.8) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at the roll coating operation on Line 2805.

Non-compliance coating is used in the roll coating operations and the control device (RTO), pursuant to 326 IAC 8-1-2 (a), is used to control VOC emissions, therefore, the following compliance method is applicable.

(ii) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions of the the roll coating operation on Line 2805 shall be less than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (i).

This equivalency was determined by the following equation:

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

Where

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

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

The equivalent pounds of VOC per gallon of coating solids as applied (E) shall be limited to less than 4.52 pounds of VOC per gallon of coating solids (L is equal to 2.8 lbs/gal and D is equal to 7.36 lbs/gal).

Actual solvent density can be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(iii) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

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

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall not be less than 88.5% (see testing results under the Compliance Monitoring section of this TSD), when the worst actual VOC content of the coating is 39.34 lb/gal.

This is an existing applicable requirement.

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

(a) The following roll coating operations of the following metal coating lines were not subject to 326 IAC 8-1-6 because each was constructed prior to 1980.
(a) Line 2701, constructed 1970;
(b) Line 2702, constructed 1970;
(c) Line 2803, constructed 1970.

(b) The metal coating line 2805 is not subject to 326 IAC 8-1-6 because it is subject to 326 IAC 8-2-3.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The roll coating operations of the metal can coating Lines 2701, 2702, 2803 and 2805 are not subject to the requirements of 326 IAC 6-3-2 because the roll coating method is exempt pursuant to 326 IAC 6-3-1(b)(6).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The roll coating operations (Lines 2701, 2702, 2803 and 2805) were constructed prior to 1997, in addition this source has limited the uncontrolled potential to emit single HAP to less than ten (10) tons per year and any combination of HAPs to less than 25 tons per year. Therefore, 326 IAC 2-4.1 does not apply.

Offset lithographic printing presses
Line 2803
Line 2805

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
These two (2) offset lithographic printing presses of the metal can coating Line 2803 and Line 2805 are not subject to the requirements of 326 IAC 6-3-2 because these presses do not generate particulate emissions.

326 IAC 8-5-5 (Graphic Arts Operations)
These two (2) offset lithographic printing presses of the metal can coating Lines 2803 and 2805 are not subject to the requirements of 326 IAC 8-5-5 because they are not rotogravure or flexographic printing presses.

326 IAC 8-1-6 (New facilities; general reduction requirements)
(a) The offset lithographic printing press of the metal can coating line 2803 was constructed prior to 1980 and the PTE VOC is less than 25 tons per year, therefore, it is not subject to 326 IAC 8-1-6.

(b) The offset lithographic printing press of metal can coating line 2805, constructed after 1980, but the PTE VOC is less than 25 tons per year, therefore, it is not subject to 326 IAC 8-1-6.

Compound manufacturing operation:

326 IAC 6.5 (PM Limitations)
326 IAC 6.5 limitations apply to source or facility located in Vanderburgh County, with its PM PTE equal to or more than 100 tons/year and the actual emissions is equal to or more than 10 tons/year.

The PM PTE of this source is less than 100 tons/year but the actual PM emissions before control of the source (from compound manufacturing) is greater than 10 tons/year. Therefore, in order to render 326 IAC 6.5 not applicable, PM emissions from the compound manufacturing operation shall not exceed 1.60 pounds per hour (lbs/hr). This is equivalent to 7.0 tons per year.

This is an existing limit for the source.

The filter shall be in operation at all times the compound manufacturing operation is being loaded and is in operation, in order to comply with this limit.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Since this compound manufacturing operation is not subject to 326 IAC 6.5, this operation is subject to 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each compound manufacturing operation shall not exceed 3.63 pounds per hour when operating at a process weight rate of 0.83 tons per hour.

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (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

The filter shall be in operation at all times the compound manufacturing operation is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New facilities; general reduction requirements)
The mixing of the compound manufacturing operation is not subject to 326 IAC 8-1-6 because it does not emit VOC.

Parts Washer:

(a) 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)
Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

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

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

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

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

(6) Store waste solvent only in closed containers.

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

Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection 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.

(b) 326 IAC 8-3-8 (Material Requirements for cold cleaner degreasers)
326 IAC 8-3-8 applies to any person who sells, offers for sale, uses, or manufacturers solvent for use in cold cleaner degreasers before January 1, 2015, in Clark, Floyd, Lake or Porter Counties or on and after January 1, 2015, anywhere in the state. This source is located in a Vanderburgh County and uses solvent in cold cleaner degreasers. Therefore, effective January 1, 2015, the degreasing operation is subject to the requirements of 326 IAC 8-3-8.

(a) Material requirements are as follows:
(1) No person shall operate a 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) Record keeping requirements are as follows:

(1) All persons subject to the requirements of subsection (a)(1) shall maintain each of the following records for each purchase:

(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).

(c) All records required by subsection (b) shall be:

(1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and

(2) reasonably accessible for an additional two (2) year period.

Natural gas-fired combustion sources:

326 IAC 6-2 (Particulate Emissions Limitations for Source of Indirect Heating)
Pursuant to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows.

(a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions of curing oven (on Lines 2701, 2702, 2803) (constructed prior to September 21, 1983) shall be limited using the following equation:

Table 1:

Combustion Unit	Installation Date	Rating MMBtu/hr	Q MMBtu/hr	Pt lb/MMBtu	PM Emissions lb/hr	PM Emissions ton/yr	Applicable Rule
Line 2701Curing Oven	1970	4.0	11.65	0.87	10.11	44.29	326 IAC 6-2-3
Line 2702 Curing Oven	1970	4.65					
Line 2803 Curing Oven	1970	3.0					

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where: Pt = pounds of particulate matter emitted per million Btu (lbs/MMBtu) heat input = 0.87
C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. = 50
a = Plume rise factor which is used to make allowance for less than theoretical plume rise. = 0.67
h = Stack height in feet. = 9.5 ft
Q = Total source maximum operating capacity rating in MMBtu/hr heat input. = 4+4.65+3 = 11.65 MMBtu/hr
N = Number of stacks. = 1

Although the calculations show that the PT is equal to 0.87 lbs/MMBtu, but pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 lbs/mmBtu heat input.

Therefore, these existing limits have been revised from 0.87 lbs/MMBtu to 0.8 lbs/MMBtu.

The source can comply with this limit (See appendix A Calculations)

(b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from indirect heating facilities constructed after September 21, 1983 shall be limited as follows:

Table 2: 326 IAC 6-2 Evaluation

Combustion Unit	Installation Date	Rating MMBtu/hr	Q MMBtu/hr	Pt lb/MMBtu (Q>10 <10,000)	PM Emissions		Applicable Rule
					lb/hr	ton/yr	
16 Plastisol Line curing ovens	1986	83.2	116.515	0.3163	36.86	161.44	326 IAC 6-2-4
18 space heaters	1986	3.06					
3 rapid air units	1986	8.685					
mix room heater	1986	0.6					
Plastisol Line 4114 curing oven	1986	0.12					
Cap Manufacturing curing ovens	1986	3.2					
Line 2805 Curing Oven	1986	6.0					
Bryan Boiler	1996	0.45	116.965	0.3160	36.96	161.91	326 IAC 6-2-4

These are existing limits for the source.

The PM emission limit was calculated using the following equation:

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

For ovens and heaters (1986):

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
= 11.62+83.2+3.06+8.685+0.6+.012+3.2+6
= 116.515 MMBtu/hr

$$Pt = \frac{1.09}{116.515^{0.26}}$$

$$= 0.3163$$

The source can comply with this limit (See appendix A Calculations)

For Boiler (1996):

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
= 116.515+0.45 = 116.965 MMBtu/hr

$$Pt = \frac{1.09}{116.965^{0.26}}$$

$$= 0.3160$$

The source can comply with this limit (See appendix A Calculations)

Scroll shears:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Since this source is not subject to 326 IAC 6.5, and the PTE of PM is less than 0.551 lbs/hr, therefore they are exempt, pursuant to 326 IAC 6-3-1(b)(14).

326 IAC 8-1-6 (New facilities; general reduction requirements)
The Scroll shears are not subject to 326 IAC 8-1-6 because they do not emit VOC.

UV Printing Line:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
This source is not subject to 326 IAC 6.5, and this UV Printing Line (UV-1-2804) is also not subject to 326 IAC 6-3-2, because it does not emit PM.

326 IAC 8-1-6 (New facilities; general reduction requirements)
This UV Printing Line (UV-1-2804) is not subject to 326 IAC 8-1-6 because the PTE VOC is less than 25 tons per year.

Compliance Determination and Monitoring Requirements

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

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

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

For VOC emission limitations:
The Permittee shall use the following equations to calculate VOC emissions:

$$\text{VOC emissions} = \left[\sum(U_C \times C_{VOC}) \times (1.0 - DE \times CE) + \sum (U_C \times C_{VOC}) \times (1.0\text{-}CE)\right] / 2000 \text{ lbs/ton}$$

Where U_C = Coating usage, gal/month
C_{VOC} = VOC Content, lbs/gal coating, less water
DE = Destruction Efficiency, %, as determined during the most recent valid compliance demonstration
CE = Capture Efficiency, %, as determined during the most recent valid compliance demonstration

For HAPs emission limitations:
The Permittee shall use the following equations to calculate single and combined HAP emissions

$$S_H = \left[\sum (U_C \times C_{HAP}) \times (1.0\text{-}DE \times CE) + \sum [\, U_C \times C_{HAP} \,] \times (1.0\text{-}CE)\right] / 2000 \text{ lbs/ton}$$

Where S_H = Single HAP emissions, tons/month
U_C = Coating usage, gals/month
C_{HAP} = Single HAP Content, lbs/gal coating
DE = Destruction Efficiency, as determined during the most recent valid compliance demonstration
CE = Capture Efficiency, as determined during the most recent valid compliance demonstration

Combined HAPs = $\sum$ Single HAP emissions

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

Control Device	Parameter	Frequency	Range
Cannister RTO	3-hour rolling average temperature	Continuous	As determined by the last valid compliance demonstration
	duct pressure	Daily	
Filters	None, since this is exhausting inside the building and the control needed during loading materials to the hopper	Operate the control when loading materials to the hopper	-

These monitoring conditions are necessary because the above listed control devices must operate properly to ensure compliance with the PSD Minor Limit for VOC pursuant to 326 IAC 2-2 (PSD), the HAP Minor Limit pursuant to 40 CFR 63 (NESHAP), and to render 326 IAC 6.5 not applicable.

The following testing is required for the source:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing
Metal coating line 2701	Thermal Oxidizer (Cannister RTO)	Five (5) years from the most valid compliance testing*	VOC and HAPs	Repeat at least every five (5) years
Metal coating line 2702				
Metal printing and coating line 2803				
Metal printing and coating line 2805				
Compound Manufacturing Operation**	Filters	None	-	-

*The above testing requirements are existing requirements for the source.

Metal printing and coating line:
According to IDEM record, the last testing for this source was planned for April 27, 2016 and no records of the testing result is recorded at this time. However, the results of the testing on July 12, 2011 were as follows:
(a) 92.7% overall control efficiency for VOC,
(b) 97.45% destruction efficiency for VOC,
(c) 95.7% destruction efficiency for single HAP, and
(d) 95.7% destruction efficiency for total HAPs.

Compound Manufacturing Operation:
Testing requirement was specified for the compound manufacturing operation in the Second Renewal 163-30180-00003, issued on December 29, 2011. Then the testing requirement was removed in the Significant Permit Modification T 163-31717-00003, issued on October 10, 2012, because the unit is small.

Testing requirement is being re-evaluated in this renewal: even though the PM PTE is 73 tons per year based on an alternative emission factor and these emissions consist more than 40% of the total PM PTE of the source, and the control needs to operate greater than 90% control efficiency to comply with a limit, no testing will still be required because the addition of the mix does not take long and the unit is enclosed while mixing. This re-evaluation has been discussed with the section chief (Dave Cline) of the OAQ Compliance Section.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 23, 2016. An additional information was received on May 25, 2016, June 2, June 17, and July 22, 2016

Conclusion

The operation of this metal closures fabrication plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T 163-36869-00003

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.

(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.

Summary
Appendix A – Emission Calculations

Company Name: Silgan White Cap Corporation
Address City IN Zip: 2201 West Maryland Street, Evansville, Indiana 47712
Part 70 Operating Permit No.: T 163-36869-00003
Permit Reviewer: Renee Traivaranon
Date: June 23, 2016

Unrestricted Potential To Emit (tons/yr) - Entire Source

Process / Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	VOC	CO	Single HAP*	Total HAPs
Metal printing and coating line									
Roll Coating Line 2701	0.00	0.00	0.00	0.00	0.00	415.20	0.00	43.41	49.74
Roll Coating Line 2702	0.00	0.00	0.00	0.00	0.00	415.20	0.00	43.41	49.74
Roll Coating Line 2803	0.00	0.00	0.00	0.00	0.00	364.97	0.00	24.77	49.67
Roll Coating Line 2805	0.00	0.00	0.00	0.00	0.00	364.97	0.00	43.41	44.57
Lithographic Printing Press - Line 2803	0.00	0.00	0.00	0.00	0.00	1.13	0.00	0.00	0.61
Lithographic Printing Press - Line 2805	0.00	0.00	0.00	0.00	0.00	1.13	0.00	0.00	0.61
Curing ovens Line 2701, 2702, 2803 and 2805	0.15	0.59	0.59	0.05	7.73	0.43	6.49	0.00	0.15
Compound Manufacturing Operation	73.00	73.00	73.00	0.00	0.00	0.00	0.00	0.00	0.00
Parts Washer-Solvent Cleaning	0.00	0.00	0.00	0.00	0.00	8.76	0.00	0.00	0.02
Other Natural Gas Combustion Units	0.88	3.51	3.51	0.28	46.13	2.54	38.75	0.00	0.87
Scroll Shears	1.77	1.77	1.77	0.00	0.00	0.00	0.00	0.00	0.00
UV Ink Process (UV-1-2804)	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.02
Totals:	**75.79**	**78.86**	**78.86**	**0.32**	**53.86**	**1,574.34**	**45.24**	**155.01**	**195.98**

Limited Potential To Emit of the Entire Source After Issuance of Renewal (tons/yr)

Process / Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	VOC	CO	Single HAP*	Total HAPs
Metal printing and coating line									
Roll Coating Line 2701	0.00	0.00	0.00	0.00	0.00		0.00		
Roll Coating Line 2702	0.00	0.00	0.00	0.00	0.00		0.00		
Roll Coating Line 2803	0.00	0.00	0.00	0.00	0.00		0.00		
Roll Coating Line 2805	0.00	0.00	0.00	0.00	0.00	233.00	0.00	9.95	22.30
Lithographic Printing Press - Line 2803	0.00	0.00	0.00	0.00	0.00		0.00		
Lithographic Printing Press - Line 2805	0.00	0.00	0.00	0.00	0.00		0.00		
Curing ovens Line 2701, 2702, 2803 and 2805	0.15	0.59	0.59	0.05	7.73		6.49		
Compound Manufacturing Operation	7.00	7.00	7.00	0.00	0.00	0.00	0.00	0.00	0.00
Parts Washer-Solvent Cleaning	0.00	0.00	0.00	0.00	0.00	8.76	0.00	0.00	0.02
Other Natural Gas Combustion Units	0.88	3.51	3.51	0.28	46.13	2.54	38.75	0.00	0.87
Scroll Shears	1.77	1.77	1.77	0.00	0.00	0.00	0.00	0.00	0.00
UV Ink Process (UV-1-2804)	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.02
Totals:	**9.79**	**12.86**	**12.86**	**0.32**	**53.86**	**244.31**	**45.24**	**9.95**	**23.20**

* MIBK is the worst single HAP.

Roll Coating Lines - 2701, 2702, 2803, & 2805

Material ID	Coating Usage "As Applied"					Coating Line				Coating Density	Weight % Volatiles	Volume % Volatiles	Weight % Water	Volume % Water	Weight % Exempt	Volume % Exempt	Weight % VOC	Volume % VOC	Weight % Solids	Volume % Solids	VOC Content	VOC Content	VOC Content	Solids Content	Unrestricted VOC PTE		326 IAC 8-2-3 Limit	Equiv. 326 IAC 8-1-2(b)	Overall Efficiency [326 IAC 8-1-2(c)]
	mg/ 4 sq-in	mg/sheet	lb/sheet	gal/sheet	gal/hr	"2701"	"2702"	"2803"	"2805"	lb/gal	%	%	%	%	%	%	%	%	%	%	lb VOC / gal coating less water	lb VOC / gal coating solids	lb VOC / gal coating	lb solids / gal coating	lb/hr	ton/yr	lb VOC / gal coating less water	lb VOC / gal solids	%
B.11.7	15	5,181	1.1E-02	1.2E-03	6.09	X	X	X		9.56	48.04%	61.41%	0%	0%	0%	0%	48.04%	61.41%	51.96%	38.59%	4.59	11.90	4.59	4.97	27.99	122.58	2.8	4.52	62.03%
B.23.5	20	6,908	1.5E-02	1.8E-03	9.23	X	X			8.42	69.95%	78.60%	0%	0%	0%	0%	69.95%	78.60%	30.05%	21.40%	5.89	27.52	5.89	2.53	54.33	237.98	2.8	4.52	83.58%
B.24.3	25	8,636	1.9E-02	2.1E-03	10.79	X	X	X	X	9.00	62.14%	75.57%	0%	0%	0%	0%	62.14%	75.57%	37.86%	24.43%	5.59	22.89	5.59	3.41	60.33	264.27	2.8	4.52	80.26%
B.24.5	30	10,363	2.3E-02	2.5E-03	12.92	X	X	X	X	9.02	61.66%	75.20%	0%	0%	0%	0%	61.66%	75.20%	38.34%	24.80%	5.56	22.43	5.56	3.46	71.84	314.67	2.8	4.52	79.85%
B.24.7	35	12,090	2.7E-02	2.9E-03	15.04	X	X	X	X	9.04	61.30%	74.92%	0%	0%	0%	0%	61.30%	74.92%	38.70%	25.08%	5.54	22.10	5.54	3.50	83.33	**364.97**	2.8	4.52	79.55%
B.24.9	40	13,817	3.0E-02	3.4E-03	17.17	X	X			9.05	61.02%	74.70%	0%	0%	0%	0%	61.02%	74.70%	38.98%	25.30%	5.52	21.83	5.52	3.53	94.80	**415.20**	2.8	4.52	79.30%
B.28.5	35	12,090	2.7E-02	2.8E-03	14.03	X	X	X	X	9.69	47.64%	60.89%	0%	0%	0%	0%	47.64%	60.89%	52.36%	39.11%	4.62	11.80	4.62	5.07	64.76	283.64	2.8	4.52	61.71%
B.29.5	25	8,636	1.9E-02	2.0E-03	10.09	X	X			9.62	51.07%	64.29%	0%	0%	0%	0%	51.07%	64.29%	48.93%	35.71%	4.91	13.76	4.91	4.71	49.59	217.19	2.8	4.52	67.15%
E.33.5	12	4,145	9.1E-03	1.1E-03	5.65	X		X		8.25	74.20%	81.04%	0%	0%	0%	0%	74.20%	81.04%	25.80%	18.96%	6.12	32.29	6.12	2.13	34.58	151.47	2.8	4.52	86.00%
E.82.5	11	3,800	8.4E-03	9.9E-04	5.06		X	X	X	8.45	52.40%	59.10%	0%	0%	0%	0%	52.40%	59.10%	47.60%	40.90%	4.43	10.83	4.43	4.02	22.39	98.05	2.8	4.52	58.25%
G.27.1	6	2,073	4.6E-03	5.8E-04	2.93	X	X			7.94	72.62%	78.22%	0%	0%	0%	0%	72.62%	78.22%	27.38%	21.78%	5.77	26.47	5.77	2.17	16.92	74.12	2.8	4.52	82.93%
G.27.4	9	3,109	6.9E-03	8.6E-04	4.38	X	X			7.98	70.45%	76.38%	0%	0%	0%	0%	70.45%	76.38%	29.55%	23.62%	5.62	23.80	5.62	2.36	24.63	107.86	2.8	4.52	81.01%
G.27.7	12	4,145	9.1E-03	1.1E-03	5.83	X	X			8.00	69.24%	75.35%	0%	0%	0%	0%	69.24%	75.35%	30.76%	24.65%	5.54	22.47	5.54	2.46	32.27	141.34	2.8	4.52	79.89%
G.27.9	15	5,181	1.1E-02	1.4E-03	7.26	X	X			8.02	68.57%	74.77%	0%	0%	0%	0%	68.57%	74.77%	31.43%	25.23%	5.50	21.80	5.50	2.52	39.95	174.97	2.8	4.52	79.27%
G.70.3	10	3,454	7.6E-03	9.5E-04	4.87		X	X	X	7.98	70.52%	76.51%	0%	0%	0%	0%	70.52%	76.51%	29.48%	23.49%	5.63	23.96	5.63	2.35	27.39	119.96	2.8	4.52	81.14%
G.70.5	12	4,145	9.1E-03	1.1E-03	5.83			X		8.00	69.79%	75.90%	0%	0%	0%	0%	69.79%	75.90%	30.21%	24.10%	5.58	23.17	5.58	2.42	32.53	142.46	2.8	4.52	80.49%
G.70.7	15	5,181	1.1E-02	1.4E-03	7.27		X	X	X	8.01	69.04%	75.26%	0%	0%	0%	0%	69.04%	75.26%	30.96%	24.74%	5.53	22.35	5.53	2.48	40.22	176.17	2.8	4.52	79.78%
G.122.9	15	5,181	1.1E-02	1.4E-03	7.30			X		7.98	68.95%	74.72%	0%	0%	0%	0%	68.95%	74.72%	31.05%	25.28%	5.50	21.77	5.50	2.48	40.17	175.94	2.8	4.52	79.24%
G.126.5	10	3,454	7.6E-03	9.7E-04	4.95	X				7.85	71.27%	76.71%	0%	0%	0%	0%	71.27%	76.71%	28.73%	23.29%	5.59	24.02	5.59	2.26	27.68	121.24	2.8	4.52	81.19%
K.A.1.5	47	16,235	3.6E-02	3.2E-03	16.49	X				11.07	41.58%	59.88%	0%	0%	0%	0%	41.58%	59.88%	58.42%	40.12%	4.60	11.47	4.60	6.47	75.90	332.44	2.8	4.52	60.61%
K.BL.5.7	27	9,326	2.1E-02	2.3E-03	11.96	X	X			8.77	57.12%	65.64%	0%	0%	0%	0%	57.12%	65.64%	42.88%	34.36%	5.01	14.58	5.01	3.76	59.90	262.35	2.8	4.52	69.00%
K.C.7.5	43	14,853	3.3E-02	3.0E-03	15.24	X	X			10.96	42.27%	60.36%	0%	0%	0%	0%	42.27%	60.36%	57.73%	39.64%	4.63	11.69	4.63	6.33	70.59	309.19	2.8	4.52	61.33%
K.I.2.3	34	11,744	2.6E-02	2.4E-03	12.13	X	X			10.89	43.22%	61.37%	0%	0%	0%	0%	43.22%	61.37%	56.78%	38.63%	4.71	12.18	4.71	6.18	57.07	249.97	2.8	4.52	62.91%
K.I.3.5	40	13,817	3.0E-02	2.8E-03	14.34	X	X			10.83	43.08%	60.69%	0%	0%	0%	0%	43.08%	60.69%	56.92%	39.31%	4.67	11.87	4.67	6.16	66.93	293.13	2.8	4.52	61.92%
K.T.2.5	35	12,090	2.7E-02	2.4E-03	12.49		X			10.88	43.01%	61.17%	0%	0%	0%	0%	43.01%	61.17%	56.99%	38.83%	4.68	12.05	4.68	6.20	58.46	256.07	2.8	4.52	62.50%
K.W.36.5	38	13,126	2.9E-02	2.6E-03	13.19	X	X			11.19	41.63%	60.34%	0%	0%	0%	0%	41.63%	60.34%	58.37%	39.66%	4.66	11.75	4.66	6.53	61.44	269.10	2.8	4.52	61.52%
K.Y.41.3	25	8,636	1.9E-02	2.2E-03	11.13	X	X			8.72	59.56%	68.87%	0%	0%	0%	0%	59.56%	68.87%	40.44%	31.13%	5.19	16.68	5.19	3.53	57.83	253.29	2.8	4.52	72.91%
K.Y.41.5	35	12,090	2.7E-02	3.0E-03	15.54		X			8.75	58.57%	67.99%	0%	0%	0%	0%	58.57%	67.99%	41.43%	32.01%	5.12	16.01	5.12	3.63	79.62	348.72	2.8	4.52	71.77%
K.Y.50.5	38	13,126	2.9E-02	3.1E-03	15.80	X	X			9.34	52.31%	63.83%	0%	0%	0%	0%	52.31%	63.83%	47.69%	36.17%	4.89	13.51	4.89	4.45	77.20	338.14	2.8	4.52	66.54%

Roll Coating Lines - 2701, 2702, 2803, & 2805

Material ID	Coating Usage "As Applied"					Coating Line				Coating Density	Weight % Volatiles	Volume % Volatiles	Weight % Water	Volume % Water	Weight % Exempt	Volume % Exempt	Weight % VOC	Volume % VOC	Weight % Solids	Volume % Solids	VOC Content	VOC Content	VOC Content	Solids Content	Unrestricted VOC Emissions		326 IAC 8-2-3 Limit	Equiv. 326 IAC 8-1-2(b)	Overall Efficiency [326 IAC 8-1-2(c)]
	mg/ 4 sq-in	mg/sheet	lb/sheet	gal/sheet	gal/hr	"2701"	"2702"	"2803"	"2805"	lb/gal	%	%	%	%	%	%	%	%	%	%	lb VOC / gal coating less water	lb VOC / gal coating solids	lb VOC / gal coating	lb solids / gal coating	lb/hr	ton/yr	lb VOC / gal coating less water	lb VOC / gal solids	%
O.93.4	9	3,109	6.9E-03	8.6E-04	4.39			X	X	7.97	74.16%	78.59%	0%	0%	0%	0%	74.16%	78.59%	25.84%	21.41%	5.91	27.61	5.91	2.06	25.92	113.54	2.8	4.52	83.63%
O.93.5	11	3,800	8.4E-03	1.0E-03	5.35	X	X	X	X	7.99	73.45%	77.97%	0%	0%	0%	0%	73.45%	77.97%	26.55%	22.03%	5.87	26.64	5.87	2.12	31.38	137.44	2.8	4.52	83.04%
O.130.3	7	2,418	5.3E-03	6.7E-04	3.44			X		7.90	75.00%	79.28%	0%	0%	0%	0%	75.00%	79.28%	25.00%	20.72%	5.93	28.60	5.93	1.98	20.39	89.31	2.8	4.52	84.20%
O.135.5	10	3,454	7.6E-03	9.4E-04	4.79			X	X	8.10	61.38%	67.05%	0%	0%	0%	0%	61.38%	67.05%	38.62%	32.95%	4.97	15.09	4.97	3.13	23.84	104.41	2.8	4.52	70.05%
O.136.5	11	3,800	8.4E-03	1.0E-03	5.35			X		7.99	72.95%	77.53%	0%	0%	0%	0%	72.95%	77.53%	27.05%	22.47%	5.83	25.94	5.83	2.16	31.17	136.50	2.8	4.52	82.58%
O.141.1	8	2,763	6.1E-03	7.6E-04	3.89	X	X	X	X	7.98	73.45%	78.12%	0%	0%	0%	0%	73.45%	78.12%	26.55%	21.88%	5.86	26.79	5.86	2.12	22.82	99.96	2.8	4.52	83.13%
O.141.3	10	3,454	7.6E-03	9.5E-04	4.86			X		7.99	72.51%	77.29%	0%	0%	0%	0%	72.51%	77.29%	27.49%	22.71%	5.79	25.51	5.79	2.20	28.16	123.35	2.8	4.52	82.28%
O.141.5	11	3,800	8.4E-03	1.0E-03	5.34			X		8.00	72.16%	76.98%	0%	0%	0%	0%	72.16%	76.98%	27.84%	23.02%	5.77	25.08	5.77	2.23	30.83	135.03	2.8	4.52	81.98%
O.162.5	11	3,800	8.4E-03	1.0E-03	5.24			X	X	8.16	59.84%	65.89%	0%	0%	0%	0%	59.84%	65.89%	40.16%	34.11%	4.88	14.32	4.88	3.28	25.56	111.97	2.8	4.52	68.43%
O.164.5	11	3,800	8.4E-03	1.0E-03	5.15	X	X	X	X	8.29	61.95%	68.57%	0%	0%	0%	0%	61.95%	68.57%	38.05%	31.43%	5.14	16.34	5.14	3.15	26.47	115.92	2.8	4.52	72.34%
S.C.12.3	10	3,454	7.6E-03	9.6E-04	4.89	X	X	X	X	7.95	70.39%	75.96%	0%	0%	0%	0%	70.39%	75.96%	29.61%	24.04%	5.60	23.28	5.60	2.35	27.34	119.74	2.8	4.52	80.59%
S.C.12.4	14	4,836	1.1E-02	1.3E-03	6.82	X	X	X	X	7.97	69.16%	74.90%	0%	0%	0%	0%	69.16%	74.90%	30.84%	25.10%	5.51	21.96	5.51	2.46	37.60	164.71	2.8	4.52	79.42%
S.C.12.6	17	5,872	1.3E-02	1.6E-03	8.27	X			X	7.98	68.58%	74.40%	0%	0%	0%	0%	68.58%	74.40%	31.42%	25.60%	5.47	21.38	5.47	2.51	45.28	198.32	2.8	4.52	78.86%
S.C.12.7	20	6,908	1.5E-02	1.9E-03	9.72	X			X	7.99	68.17%	74.04%	0%	0%	0%	0%	68.17%	74.04%	31.83%	25.96%	5.45	20.98	5.45	2.54	52.95	231.93	2.8	4.52	78.46%
S.C.14.1	3	1,036	2.3E-03	3.0E-04	1.51	X	X		X	7.72	80.25%	84.25%	0%	0%	0%	0%	80.25%	84.25%	19.75%	15.75%	6.20	39.34	6.20	1.52	9.35	40.95	2.8	4.52	88.51%
S.C.14.4	9	3,109	6.9E-03	8.8E-04	4.49	X	X		X	7.78	75.70%	80.49%	0%	0%	0%	0%	75.70%	80.49%	24.30%	19.51%	5.89	30.19	5.89	1.89	26.46	115.90	2.8	4.52	85.03%
S.C.52.5	2	691	1.5E-03	2.0E-04	1.00	X	X		X	7.80	80.30%	83.96%	0%	0%	0%	0%	80.30%	83.96%	19.70%	16.04%	6.26	39.05	6.26	1.54	6.24	27.32	2.8	4.52	88.43%
S.C.54.5	20	6,908	1.5E-02	1.9E-03	9.71	X	X		X	8.00	68.64%	74.61%	0%	0%	0%	0%	68.64%	74.61%	31.36%	25.39%	5.49	21.63	5.49	2.51	53.32	233.53	2.8	4.52	79.10%
S.C.65.5	20	6,908	1.5E-02	1.9E-03	9.71	X	X		X	8.00	67.41%	73.28%	0%	0%	0%	0%	67.41%	73.28%	32.59%	26.72%	5.39	20.18	5.39	2.61	52.36	229.34	2.8	4.52	77.61%
W.42.3	20	6,908	1.5E-02	1.5E-03	7.83	X	X			9.92	51.65%	67.16%	0%	0%	0%	0%	51.65%	67.16%	48.35%	32.84%	5.12	15.60	5.12	4.80	40.12	175.72	2.8	4.52	71.03%
W.42.5	30	10,363	2.3E-02	2.3E-03	11.58	X	X	X		10.06	49.56%	65.26%	0%	0%	0%	0%	49.56%	65.26%	50.44%	34.74%	4.99	14.35	4.99	5.07	57.74	252.92	2.8	4.52	68.51%
W.42.7	35	12,090	2.7E-02	2.6E-03	13.45	X	X			10.11	48.93%	64.67%	0%	0%	0%	0%	48.93%	64.67%	51.07%	35.33%	4.95	14.00	4.95	5.16	66.51	291.32	2.8	4.52	67.72%
W.43.5	35	12,090	2.7E-02	2.4E-03	12.31		X			11.04	42.44%	61.04%	0%	0%	0%	0%	42.44%	61.04%	57.56%	38.96%	4.69	12.03	4.69	6.35	57.69	252.68	2.8	4.52	62.42%
W.43.7	38	13,126	2.9E-02	2.6E-03	13.34	X	X	X	X	11.06	42.19%	60.79%	0%	0%	0%	0%	42.19%	60.79%	57.81%	39.21%	4.67	11.90	4.67	6.39	62.27	272.72	2.8	4.52	62.02%
W.43.8	40	13,817	3.0E-02	2.7E-03	14.02	X	X			11.08	41.97%	60.57%	0%	0%	0%	0%	41.97%	60.57%	58.03%	39.43%	4.65	11.79	4.65	6.43	65.20	285.58	2.8	4.52	61.68%
W.43.9	42	14,508	3.2E-02	2.9E-03	14.68	X				11.11	41.66%	60.26%	0%	0%	0%	0%	41.66%	60.26%	58.34%	39.74%	4.63	11.65	4.63	6.48	67.96	297.64	2.8	4.52	61.20%
W.60.5	24	8,290	1.8E-02	1.8E-03	9.42	X	X			9.89	50.42%	63.47%	0%	0%	0%	0%	50.42%	63.47%	49.58%	36.53%	4.99	13.65	4.99	4.90	47.00	205.85	2.8	4.52	66.89%
Line 2701 Total																									94.80	415.20			
Line 2702 Total																									94.80	415.20			
Line 2803 Total																									83.33	364.97			
Line 2805 Total																									83.33	364.97			
Uncontrolled																									356.24	1,560.35			
																								Minimum Control Efficiency (CE) Needed to comply with PSD and HAP Minor Limits:	*85.1%*	*85.1%*			
Line 2701 Total																									14.16	62.00			
Line 2702 Total																									14.16	62.00			
Line 2803 Total																									12.44	54.50			
Line 2805 Total																									12.44	54.50			
Controlled																									53.20	233.00			

The above information was carried over from the T 163-30180-00003, Issued on December 29, 2011. However, the 326 IAC 8-2-3 Limit and Equiv. 326 IAC 8-1-2(b) have been corrected to match the calculations.
See Methodology on the next page.

Roll Coating Lines - 2701, 2702, 2803, & 2805

Weight % HAP1	Emissions - HAP1		Weight % HAP2	Emissions - HAP2		Weight % HAP3	Emissions - HAP3		Weight % HAP4	Emissions - HAP4		Weight % HAP5	Emissions - HAP5		Weight % HAP6	Emissions - HAP6		Weight % HAP7	Emissions - HAP7	
112-34-5 2-(2-butoxy-ethoxy) ethanol	lb/hr	ton/yr	112-07-2 2-butoxy-ethyl acetate	lb/hr	ton/yr	98-82-8 cumene	lb/hr	ton/yr	100-41-4 ethyl-benzene	lb/hr	ton/yr	50-00-0 formal-dehyde	lb/hr	ton/yr	111-90-0 diethylene glycol monoethyl ether	lb/hr	ton/yr	110-54-3 hexane	lb/hr	ton/yr
9.28%	2.60	11.38	6.77%	1.89	8.30	0.09%	0.03	0.11				0.07%	0.02	0.09						
									3.34%	1.81	7.95	0.28%	0.15	0.67						
						0.55%	0.33	1.45	0.92%	0.56	2.43									
						0.56%	0.40	1.76	0.94%	0.68	2.96									
						0.57%	0.47	2.08	0.94%	0.78	3.43									
						0.57%	0.54	2.37	0.95%	0.90	3.94									
						0.09%	0.06	0.26	0.28%	0.18	0.79	0.03%	0.02	0.09						
			18.03%	8.94	39.16							0.06%	0.03	0.13						
									5.16%	1.78	7.82									
						0.02%	0.00	0.02	0.32%	0.07	0.31									
												0.02%	0.00	0.01						
												0.03%	0.01	0.03						
												0.03%	0.01	0.04						
												0.03%	0.01	0.05						
						0.43%	0.12	0.52	0.17%	0.05	0.20	0.06%	0.02	0.07						
						0.44%	0.14	0.63	0.18%	0.06	0.26	0.06%	0.02	0.09						
						0.45%	0.18	0.79	0.18%	0.07	0.32	0.06%	0.02	0.11						
						0.09%	0.04	0.16				0.06%	0.02	0.11						
									4.49%	1.24	5.44	0.09%	0.02	0.11				0.26%	0.07	0.32
						0.05%	0.04	0.17	0.04%	0.03	0.13									
						0.06%	0.04	0.16	0.05%	0.03	0.13									
						0.03%	0.02	0.09	0.03%	0.02	0.09									
						0.05%	0.03	0.12	0.04%	0.02	0.10									
						0.05%	0.03	0.15	0.04%	0.03	0.12									
						0.05%	0.03	0.13	0.04%	0.02	0.10									
			5.52%	3.39	14.85				0.28%	0.17	0.75	0.02%	0.01	0.05						
						0.14%	0.08	0.35	0.06%	0.03	0.15									
						0.14%	0.11	0.49	0.07%	0.06	0.24									
						0.05%	0.04	0.17	0.79%	0.61	2.67									

Roll Coating Lines - 2701, 2702, 2803, & 2805

Weight % HAP1	Emissions - HAP1		Weight % HAP2	Emissions - HAP2		Weight % HAP3	Emissions - HAP3		Weight % HAP4	Emissions - HAP4		Weight % HAP5	Emissions - HAP5		Weight % HAP6	Emissions - HAP6		Weight % HAP7	Emissions - HAP7	
112-34-5 2-(2-butoxy-ethoxy) ethanol	lb/hr	ton/yr	112-07-2 2-butoxy-ethyl acetate	lb/hr	ton/yr	98-82-8 cumene	lb/hr	ton/yr	100-41-4 ethyl-benzene	lb/hr	ton/yr	50-00-0 formal-dehyde	lb/hr	ton/yr	111-90-0 diethylene glycol monoethyl ether	lb/hr	ton/yr	110-54-3 hexane	lb/hr	ton/yr
									0.26%	0.07	0.30	0.10%	0.03	0.11						
									0.26%	0.08	0.36	0.11%	0.03	0.15						
												0.17%	0.03	0.15						
						0.08%	0.02	0.08	0.16%	0.04	0.17	0.33%	0.08	0.34						
									0.12%	0.04	0.16									
									0.12%	0.03	0.12									
									0.12%	0.03	0.15									
									0.12%	0.04	0.16									
						0.07%	0.02	0.08	0.17%	0.04	0.19	0.32%	0.08	0.36						
									0.18%	0.05	0.21	0.35%	0.09	0.41						
						0.09%	0.02	0.11				0.06%	0.02	0.07						
						0.09%	0.03	0.15				0.06%	0.02	0.10						
						0.09%	0.04	0.18				0.06%	0.03	0.12						
						0.09%	0.05	0.21				0.06%	0.03	0.14						
									3.85%	0.36	1.58	0.03%	0.00	0.01						
									4.74%	1.25	5.49	0.04%	0.01	0.05						
						0.54%	0.03	0.15	0.11%	0.01	0.03									
						0.09%	0.05	0.21	0.03%	0.02	0.07									
												0.09%	0.05	0.21						
			11.39%	5.35	23.45							0.04%	0.02	0.08	11.21%	5.27	23.08			
	2.60	11.38		8.94	39.16		0.54	2.37		1.81	7.95		0.15	0.67		5.27	23.08		0.072	0.32
	2.60	11.38		8.94	39.16		0.54	2.37		1.81	7.95		0.15	0.67		5.27	23.08		0	0
	2.60	11.38		1.89	8.30		0.47	2.08		1.78	7.82		0.08	0.34		0	0		0	0
	0.00	0		0	0		0.47	2.08		1.25	5.49		0.08	0.34		0	0		0	0
	7.79	34.13		19.78	86.62		2.03	8.89		6.67	29.21		0.46	2.02		10.54	46.15		0.072	0.32
	70.85%	*70.85%*		*88.5%*	*88.51%*		*0%*	*0%*		*65.9%*	*65.92%*		*0%*	*0%*		*78.45%*	*78.45%*		*0%*	*0%*
	0.76	3.32		1.03	4.50		0.54	2.37		0.62	2.71		0.15	0.67		1.14	4.97		0.07	0.32
	0.76	3.32		1.03	4.50		0.54	2.37		0.62	2.71		0.15	0.67		1.14	4.97		0.00	0
	0.76	3.32		0.22	0.95		0.47	2.08		0.61	2.66		0.08	0.34		0.00	0		0.00	0
	0.00	0		0.00	0		0.47	2.08		0.43	1.87		0.08	0.34		0.00	0		0.00	0
	2.27	9.95		2.27	9.95		2.03	8.89		2.27	9.95		0.46	2.02		2.27	9.95		0.0720	0.32

Roll Coating Lines - 2701, 2702, 2803, & 2805

Weight % HAP8	Emissions - HAP8		Weight % HAP9	Emissions - HAP9		Weight % HAP10	Emissions - HAP10		Weight % HAP11	Emissions - HAP11		Weight % HAP12	Emissions - HAP12		Weight % HAP13	Emissions - HAP13		HAP Content	Total HAP
78-59-1 isophorone	lb/hr	ton/yr	67-56-1 methanol	lb/hr	ton/yr	108-10-1 MIBK	lb/hr	ton/yr	91-20-3 napthalene	lb/hr	ton/yr	108-88-3 toluene	lb/hr	ton/yr	1330-20-7 xylene	lb/hr	ton/yr	lb HAP / gal coating solids	ton/yr
5.10%	1.43	6.25							1.02%	0.29	1.25	0.09%	0.03	0.11	0.09%	0.03	0.11	841.85	27.59
												0.28%	0.1521	0.67	15.86%	8.62	37.74	456.33	47.03
2.95%	1.78	7.80				1.57%	0.95	4.15				0.09%	0.05	0.24	5.54%	3.34	14.64	731.34	30.71
2.99%	2.15	9.41				1.59%	1.14	5.00				0.09%	0.06	0.28	5.61%	4.03	17.65	871.65	37.07
3.02%	2.62	11.02				1.60%	1.33	5.84				0.09%	0.07	0.33	5.66%	4.72	20.66	1009.35	43.36
3.04%	2.88	12.62				1.62%	1.54	6.73				0.10%	0.09	0.42	5.70%	5.40	23.67	1149.95	49.74
									1.95%	1.26	5.53	0.09%	0.06	0.26	1.20%	0.78	3.40	211.52	10.32
																		1304.94	39.29
						2.62%	0.91	3.97				0.44%	0.1522	0.67	24.57%	8.50	37.22	679.71	49.67
												0.02%	0.00	0.02	1.36%	0.30	1.33	9.31	1.69
						15.37%	2.60	11.39							0.08%	0.01	0.06	516.43	11.47
						16.58%	4.08	17.88							0.08%	0.02	0.09	749.09	18.00
						17.27%	5.57	24.41							0.09%	0.03	0.13	980.40	24.58
						17.64%	7.05	30.86							0.09%	0.04	0.16	1212.78	31.07
												0.09%	0.02	0.11	5.49%	1.50	6.59	39.66	7.49
												0.09%	0.03	0.13	1.58%	0.51	2.25	45.51	3.35
												0.09%	0.04	0.16	1.62%	0.65	2.85	55.42	4.23
						14.08%	5.66	24.77							0.27%	0.11	0.48	975.30	25.51
7.42%	2.05	9.00				2.50%	0.69	3.03				0.26%	0.07	0.32	21.48%	5.95	26.04	766.20	44.25
									1.18%	0.90	3.92				0.18%	0.14	0.60	143.49	4.82
									0.63%	0.38	1.65				0.23%	0.14	0.60	61.11	2.54
									1.23%	0.87	3.80				0.17%	0.12	0.53	135.86	4.51
									1.39%	0.79	3.47				0.17%	0.10	0.42	128.57	4.12
									1.28%	0.86	3.75				0.19%	0.13	0.56	136.33	4.57
									1.37%	0.80	3.51				0.17%	0.10	0.44	129.13	4.17
						0.18%	0.11	0.48	2.83%	1.74	7.62	0.09%	0.06	0.24	1.29%	0.79	3.47	834.78	27.48
									2.26%	1.31	5.72				1.63%	0.94	4.13	215.54	10.36
									2.31%	1.84	8.06				1.67%	1.33	5.82	296.20	14.61
									1.32%	1.02	4.46				3.36%	2.59	11.36	233.09	18.67

Roll Coating Lines - 2701, 2702, 2803, & 2805

Weight % HAP8	Emissions - HAP8		Weight % HAP9	Emissions - HAP9		Weight % HAP10	Emissions - HAP10		Weight % HAP11	Emissions - HAP11		Weight % HAP12	Emissions - HAP12		Weight % HAP13	Emissions - HAP13		HAP Content	Total HAP
78-59-1 isophorone	lb/hr	ton/yr	67-56-1 methanol	lb/hr	ton/yr	108-10-1 MIBK	lb/hr	ton/yr	91-20-3 napthalene	lb/hr	ton/yr	108-88-3 toluene	lb/hr	ton/yr	1330-20-7 xylene	lb/hr	ton/yr	lb HAP / gal coating solids	ton/yr
															1.09%	0.28	1.24	19.23	1.65
															1.12%	0.35	1.54	23.19	2.05
															0.43%	0.09	0.38	7.34	0.54
									2.71%	0.65	2.83	0.08%	0.02	0.08	0.82%	0.20	0.86	106.96	4.36
												0.01%	0.00	0.01	0.53%	0.17	0.72	7.99	0.90
									0.12%	0.03	0.12	0.01%	0.00	0.01	0.49%	0.11	0.49	11.46	0.74
									0.13%	0.04	0.16	0.01%	0.00	0.01	0.51%	0.14	0.63	14.13	0.95
									0.13%	0.04	0.18	0.01%	0.00	0.01	0.51%	0.16	0.69	15.25	1.04
									4.33%	1.11	4.85	0.08%	0.02	0.09	0.83%	0.21	0.93	164.91	6.49
									1.63%	0.43	1.89				0.79%	0.21	0.92	81.90	3.42
						13.43%	3.67	16.08							0.26%	0.07	0.31	665.09	16.57
						13.99%	5.26	23.04							0.27%	0.10	0.44	912.93	23.73
						14.25%	6.45	28.26							0.27%	0.12	0.54	1098.05	29.09
						14.43%	7.64	33.47							0.28%	0.15	0.65	1282.95	34.46
6.40%	0.60	2.62	0.07%	0.01	0.03	2.13%	0.20	0.87				0.34%	0.03	0.14	18.44%	1.72	7.55	331.42	12.80
7.87%	2.08	9.12	0.08%	0.02	0.09	2.62%	0.69	3.04				0.42%	0.11	0.49	22.69%	6.00	26.30	910.56	44.57
						3.10%	0.19	0.85							11.68%	0.73	3.19	68.70	4.22
						18.59%	9.91	43.41							0.09%	0.05	0.21	1696.93	43.90
						15.88%	8.31	36.42										1351.73	36.63
															0.62%	0.25	1.09	0.19	1.09
															0.65%	0.38	1.64	0.19	1.64
															0.66%	0.44	1.92	0.19	1.92
									0.82%	0.47	2.07				0.16%	0.09	0.40	72.40	2.48
									0.78%	0.49	2.13				0.16%	0.10	0.44	73.97	2.56
									0.74%	0.48	2.11				0.16%	0.10	0.46	73.20	2.57
									0.70%	0.48	2.08				0.16%	0.11	0.48	71.79	2.56
																		1555.92	46.60
	2.88	12.62		0.021	0.09		9.91	43.41		1.74	7.62		0.15	0.67		8.62	37.74		49.74
	2.88	12.62		0.021	0.09		9.91	43.41		1.84	8.06		0.15	0.67		8.62	37.74		49.74
	2.52	11.02		0	0		5.66	24.77		1.26	5.53		0.15	0.67		8.50	37.22		49.67
	2.52	11.02		0.021	0.09		9.91	43.41		1.26	5.53		0.15	0.67		6.00	26.30		44.57
	10.80	47.29		0.064	0.28		35.39	155.01		6.10	26.73		0.61	2.67		31.74	139.00		193.72
	78.95%	*78.95%*		*0%*	*0%*		*93.58%*	*93.58%*		*62.78%*	*62.78%*		*0%*	*0%*		*92.84%*	*92.84%*		*88.49%*
	0.61	2.66		0.02	0.09		0.64	2.79		0.65	2.83		0.15	0.67		0.62	2.70		5.73
	0.61	2.66		0.02	0.09		0.64	2.79		0.68	3.00		0.15	0.67		0.62	2.70		5.73
	0.53	2.32		0.00	0		0.36	1.59		0.47	2.06		0.15	0.67		0.61	2.66		5.72
	0.53	2.32		0.02	0.09		0.64	2.79		0.47	2.06		0.15	0.67		0.43	1.88		5.13
	2.27	9.95		0.0635	0.28		2.27	9.95		2.27	9.95		0.61	2.67		2.27	9.95		22.30

Roll Coating Operations - Lines 2701, 2702, 2803, and 2805

METHODOLOGY

	34.812	in	
x	39.69	in	
	1,382	sq-in	Surface Area of each metal sheet
	5,100	sheets/hr	Line Capacity (each Line) Maximum

Roll Coating => assumed 100% transfer efficiency (no PM emissions)
The "X" indicates if the coating was used on a particular coating line for this time period.
Usage (mg/sq-in) = Usage (mg/ 4 sq-in) x Surface Area (sq-in/sheet) / 4
Usage (lb/sheet) = Usage (mg/sheet) x 2.204623e-6 lb/mg
Usage (gal/sheet) = Usage (lb/sheet) / Density (lb/gal)
Usage (gal/hr) = Usage (gal/sheet) x Line Capacity (sheets/hr)
Density (lb/gal) was provided on the Silgan VOC Data Sheets
Volatiles Content (wt %) was provided on the Silgan VOC Data Sheets
Water Content (wt %) was provided on the Silgan VOC Data Sheets
VOC Content (wt %) = Total Volatiles (wt %) - Water Content (wt %) - Exempt Volatiles (wt %)
Solids Content (vol %) was provided on the Silgan VOC Data Sheets
VOC Content less water (lb/gal) = Density (lb/gal) x [Total Volatiles (wt %) - Water Content (wt %) - Exempt Volatiles (wt %)] / [1 - Water Content (vol %) - Exempt Volatiles (vol %)]
VOC Content (lb/gal solids) = Density (lb/gal) x [Total Volatiles (wt %) - Water Content (wt %) - Exempt Volatiles (wt %)] / Solids Content (vol %)
VOC Content (lb/gal) = Density (lb/gal) x [Total Volatiles (wt %) - Water Content (wt %) - Exempt Volatiles (wt %)]
HAP Content (lb/gal solids) = Sum [CAS (wt %) where CAS = CAAA HAP] x Density / Solids Content (vol %)
Potential VOC (lb/hr) = VOC Content less water (lb/gal) x Usage (gal/hr)
Potential VOC (ton/yr) = Potential VOC (lb/hr) x (8760 hr/yr) x (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) x Weight % organics) / (Volume % solids) [See calculation methodology below for equivalent emission limit per 326 IAC 8-1-2(b).]
Potential HAP (lb/hr) = VOC Content less water (lb/gal) x HAP (wt %) x Usage (gal/hr)
Potential HAP (ton/yr) = Potential HAP (lb/hr) x (8760 hr/yr) x (1 ton/2000 lbs)

Operating Permit Requirements:

[326 IAC 8-1-2(b)]

$$E = \frac{L}{(1 - (L/D))}$$

where:
L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
L = 2.8 lb/gal *Applicable rule requirements*
D = Density of VOC in coating in pounds per gallon of VOC;
D = 7.36 lb/gal *Baseline solvent density of presumptive RACT coating*
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
E = 4.52 lb/gal solids

[326 IAC 8-1-2(c)]

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

where:
V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
V = 39.34 lb/gal solids *VOC Content of worst case coating*
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
E = 4.52 lb/gal solids *From calculation in 326 IAC 8-1-2(b) above for the corresponding worst case coating*
O = Equivalent overall efficiency of the capture system and control device as a percentage.
O = 88.51%

The above information was carried over from the T 163-30180-00003, Issued on December 29, 2011.
The testing on July 12, 2011, indicated the over all control efficiency was 92.7%.

Lithographic Printing Presses - Lines 2803 and 2805

Ink Density:	10.0	lb/gal
Line Capacity:	4,200	sheets/hr
Maximum Ink Usage:	3	lb/ 1000 sheets
	12.6	lb/hr
	1.26	gal/hr
	11,038	gal/yr

Ink Name: INX INK869	Density (lb/gal)	Weight % HAP (%)	Max. Usage (gal/yr)	HAP Emissions (ton/yr)
Ink Press on Line 2803 - installed 1970				
Manganese Compounds	10.0	0.85%	11,038	0.47
Dimethyl Phthalate	10.0	0.18%	11,038	9.9E-02
Toluene	10.0	0.03%	11,038	1.7E-02
Glycol Ethers	10.0	0.01%	11,038	5.5E-03
Cobalt Compounds	10.0	0.01%	11,038	5.5E-03
Hydroquinone	10.0	0.01%	11,038	5.5E-03
Acrylic Acid	10.0	0.01%	11,038	5.5E-03
Total HAP		1.10%		0.61
Ink Press on Line 2805 - installed 1986				
Manganese Compounds	10.0	0.85%	11,038	0.47
Dimethyl Phthalate	10.0	0.18%	11,038	9.9E-02
Toluene	10.0	0.03%	11,038	1.7E-02
Glycol Ethers	10.0	0.01%	11,038	5.5E-03
Cobalt Compounds	10.0	0.01%	11,038	5.5E-03
Hydroquinone	10.0	0.01%	11,038	5.5E-03
Acrylic Acid	10.0	0.01%	11,038	5.5E-03
Total HAP		1.10%		0.61
Totals for both presses	single HAP	Manganese Compounds		0.94
Totals for both presses	Total HAP			1.21

METHODOLOGY
Estimated Emissions Tons per Year = Wt % HAP x Maximum Usage (Gal/year) x Density (Lb/Gal) x (1 ton/2000 Lbs)

Ink Name: INX INK869	Density (lb/gal)	Weight % VOC (%)	Max. Usage (gal/yr)	VOC Emissions (ton/yr)
Ink Press on Line 2803 - installed 1970				
VOC	10.0	2.04%	11,038	1.13
Ink Press on Line 2805 - installed 1986				
VOC	10.0	2.04%	11,038	1.13
Totals for both presses	VOC			2.25

METHODOLOGY
Estimated Emissions Tons per Year = Wt % VOC x Maximum Usage (Gal/year) x Density (Lb/Gal) x (1 ton/2000 Lbs)

The above information was carried over from the T 163-30180-00003, Issued on December 29, 2011.

Compound Manufacturing Operation

The compound mixing room mixes dry and wet ingredients to manufacture the plastisol that is used in another operation in the facility. Plastisol is the material on the inside of a metal cap that seals the cap to the bottle. The compound mixing room consists of mixing a dry product with a liquid. In the area where it is mixed there is a small exhaust blower with fiberglass filters. It is not a continuous operation, they will make a batch and then it will be at least 30 minutes before the next batch.

No. of Units:	1	constructed in 2003	
Batch Time:	30	min	
Capacity:	20	tons plastisol/day [powder and liquid]	
	48	batches/day	
	0.417	tons plastisol/batch	
	0.833	tons plastisol/hr	
VOC usage:	none		
Emission Factor:	20	lb/ton plastisol	*provided by Silgan is the the same EF from*
	20	lb/ton pigment	*AP-42, Ch. 6.4 (Paint Manufacturing)*
Uncontrolled			
$PM/PM_{10}/PM_{2.5}$ Emissions:	16.67	lb/hr	
	400	lb/day	
	73.00	ton/yr	
Limited			
$PM/PM_{10}/PM_{2.5}$ Emissions:	7.00	ton/yr	
	1.60	lb/hr	This required 90.40% control efficiency.
Controlled			
PM Control Efficiency:	95%	fiberglass filters	
$PM/PM_{10}/PM_{2.5}$ Emissions:	20.0	lb/day	
	3.65	ton/yr	
	0.833	lb/hr	
Assumed Grain Loading:	0.03	gr/dscf	
Assumed Air Flow Rate:	6,481	CFM	

326 IAC 6.5 (Particulate Emission Limitations except Lake County)

Siligan intends to limit the PTE for particulate matter to less than 10 tons per year for the entire source. Therefore, the requirements of 326 IAC 6.5 will not be applicable.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

P = 0.83 ton/hr 1,667 lb/hr

E = 3.63 lb/hr

Scroll Shears

Each scroll shear takes a sheet of coated metal and chops it into pieces that will fit into machines further down in the manufacturing process.

No. of Units:	7	constructed in 1970	
Line Speed:	24	sheets/min	
	1,440	sheets/hr	
PM Emission Rate:	0.08	lb/2000 sheets	
	0.058	lb/hr	
	0.252	ton/yr	*per scroll shear*
	504.58	lb/yr	*per scroll shear*
	1.77	**ton/yr**	***Total PTE***
Maximum Process Weight:	5,000	lb/2000 sheets	*per scroll shear*
	2.50	lb/sheet	
	3,600	lb/hr	
	1.80	ton/hr	

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

P =	1.80	ton/hr	3,600	lb/hr
E =	6.08	lb/hr	26.63	ton/yr *per scroll shear*

VOC Emissions: none

Quantification of PM Emissions from the Scroll Shears

Silgan uses two different types of slit sheets. One has a gold coating and the other has a white coating with blue print. Both sheet types are coated and pass through the waxers prior to the scroll shears operation. Because the slit sheets are stacked in 1000s and all the large sheets are slit into four pieces, the trial was conducted using multiples of 250 sheets.

Gold Coating	weight before scroll shears	weight of trim pieces	Percent Loss	weight of good pieces	total weight after scroll shears
250 sheets	610.5 lbs	7.7 lbs	1.3%	602.8 lbs	610.5 lbs
500 sheets	1,219.4 lbs	14.7 lbs	1.2%	1,204.7 lbs	1,219.4 lbs
2000 sheets	4,859.0 lbs	58.6 lbs	1.2%	4,800.4 lbs	4,859.0 lbs

White Coating with Blue print	weight before scroll shears	weight of trim pieces	Percent Loss	weight of good pieces	total weight after scroll shears
250 sheets	625.5 lbs	8.2 lbs	1.3%	617.3 lbs	625.5 lbs
500 sheets	1,249.4 lbs	16.0 lbs	1.3%	1,233.4 lbs	1,249.4 lbs
2000 sheets	4,978.9 lbs	64.1 lbs	1.3%	4,914.8 lbs	4,978.9 lbs

Based on this trial, the process weight rate for each scroll shear will be assumed to be 5000 lb/2000 sheets. The loss rate of 1.3% will not be used as the particulate emissions factor because each trim piece is a sliver of the metal sheet that weighs approximately 0.5 ounces.

Remarks: Silgan found some metal fines around and below the area where the sheets were sheared; however, the measurement scale used for the trial is only calibrated to one tenth of a pound, and the amount of material prior to cutting was equal to the amount of good pieces plus trim pieces, the amount of fines were assumed to be less than one tenth of a pound.

The range of values that would measure as one tenth of a pound is 0.14 to 0.05 (on the scale used by Silgan for this trial). Therefore the PM emission rate of the PM fines will be estimated as 0.08 lb/2000 sheets.

Parts Washer-Solvent Cleaning

Solvent Usage:	2	gal/hr
	17,520	gal/yr
Density:	8.33	lb/gal
Temperature:	70	F
VOC Content:	1	lb/gal
VOC PTE:	8.76	ton/yr

The parts washer was moved from the Insignificant activities of T 163-30180-00003, Issued on December 29, 2011, and moved to the significant activities since the PTE is greater than 5 tons/year.

Insignificant Activities

UV Ink Process (UV-1-2804)

Line Capacity:	4,800	sheets/hr
Maximum Ink Weight:	0.6893	lb/ 1000 sheets
Maximum Ink Usage:	3.30864	lb/hr
	28,984	lb/yr

	Weight % VOC	VOC Emissions			Weight % Toluene	Toluene Emissions		
Line #	(%)	(lb/hr)	(lb/yr)	(ton/yr)	(%)	(lb/hr)	(lb/yr)	(ton/yr)
UV-1	0.108%	3.57E-03	31.30	0.0157	0.108%	3.57E-03	31.30	0.0157

All of the VOC is HAP toluene.
The UV ink contains only one HAP, toluene. The wt% Toluene is provided from the MSDS for the Ink material.

VOC Emissions:	0.0858	lb/day

Methodology
VOC PTE (lb/hr) = Maximum UV Ink Use (lb/hr) x Wt% VOC
VOC PTE (lb/yr) = Maximum UV Ink Use (lb/yr) x Wt% VOC
VOC PTE (ton/yr) = Maximum UV Ink Use (lb/yr) x Wt% VOC x 1 ton/2000 lbs
HAP PTE (lb/hr) = Maximum UV Ink Use (lb/hr) x Wt% Toluene
HAP PTE (lb/yr) = Maximum UV Ink Use (lb/yr) x Wt% Toluene
HAP PTE (ton/yr) = Maximum UV Ink Use (lb/yr) x Wt% Toluene x 1 ton/2000 lbs

The above information was carried over from the T 163-30180-00003, Issued on December 29, 2011.

Curing ovens for printing and coating lines

Emission Unit	Heat Input Capacity		Potential Throughput		Installation Date
Line 2805 curing oven	6.0	MMBtu/hr	52.56	MMCF/yr	1986
Line 2701 curing oven	4.0	MMBtu/hr	35.04	MMCF/yr	1970
Line 2702 curing oven	4.65	MMBtu/hr	40.73	MMCF/yr	1970
Line 2803 curing oven	3.0	MMBtu/hr	26.28	MMCF/yr	1970
Maximum Capacity:	17.7	MMBtu/hr	154.61	MMCF/yr	

	Potential To Emit - Regulated Pollutants						
	CO	NO_X	PM	PM_{10}	$PM_{2.5}$	SO_2	VOC
Emission Factor (lb/MMCF)	84	100	1.9	7.6	7.6	0.6	5.5
Uncontrolled Potential To Emit (ton/yr)	6.49	7.73	0.15	0.59	0.59	0.05	0.43

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined.

**Emission Factors for NO_X: Uncontrolled = 100, Low NO_X Burner = 50, Low NO_X Burners/Flue gas recirculation = 32

	Potential To Emit - Hazardous Air Pollutants										
	HAPs - Organics					HAPs - Metals					Total HAPs
	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni	
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Uncontrolled Potential To Emit (ton/yr)	1.6E-04	9.3E-05	5.8E-03	0.14	2.6E-04	3.9E-05	8.5E-05	1.1E-04	2.9E-05	1.6E-04	0.15

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
The N_2O Emission Factor for uncontrolled is 2.2. The N_2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Emission (ton/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / 2,000 lb/ton

Natural Gas Combustion - (others)

Emission Unit	Heat Input Capacity		Potential Throughput		Installation Date
Bryan Boiler	0.45	MMBtu/hr	3.94	MMCF/yr	1996
16 Plastisol Line curing ovens	83.2	MMBtu/hr	728.83	MMCF/yr	1986
18 space heaters	3.06	MMBtu/hr	26.81	MMCF/yr	1986
3 rapid air units	8.685	MMBtu/hr	76.08	MMCF/yr	1986
mix room heater	0.6	MMBtu/hr	5.26	MMCF/yr	1986
Plastisol Line 4114 curing oven	0.12	MMBtu/hr	1.05	MMCF/yr	1986
Cap Manufacturing curing ovens	3.2	MMBtu/hr	28.03	MMCF/yr	1986
Cannister RTO	6.0	MMBtu/hr	52.56	MMCF/yr	1970
Maximum Capacity:	105.3	MMBtu/hr	922.56	MMCF/yr	

	Potential To Emit - Regulated Pollutants						
	CO	NO_X	PM	PM_{10}	$PM_{2.5}$	SO_2	VOC
Emission Factor (lb/MMCF)	84	100	1.9	7.6	7.6	0.6	5.5
Uncontrolled Potential To Emit (ton/yr)	38.75	46.13	0.88	3.51	3.51	0.28	2.54

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined.

**Emission Factors for NO_X: Uncontrolled = 100, Low NO_X Burner = 50, Low NO_X Burners/Flue gas recirculation = 32

	Potential To Emit - Hazardous Air Pollutants										
	HAPs - Organics					HAPs - Metals					Total HAPs
	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni	
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Uncontrolled Potential To Emit (ton/yr)	9.7E-04	5.5E-04	3.5E-02	0.83	1.6E-03	2.3E-04	5.1E-04	6.5E-04	1.8E-04	9.7E-04	0.87

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
The N_2O Emission Factor for uncontrolled is 2.2. The N_2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Emission (ton/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / 2,000 lb/ton

326 IAC 6-2 Evaluation

Combustion Unit	Installation Date	Rating (MMBtu/hr)	Q (MMBtu/hr)	Pt (lb/MMBtu) (if Q >10<10,000)	Applicable Rule
Bryan Boiler	1996	0.45	116.965	0.3160	326 IAC 6-2-4
16 Plastisol Line curing ovens	1986	83.2	116.515	0.3163	326 IAC 6-2-4
18 space heaters	1986	3.06			
3 rapid air units	1986	8.685			
mix room heater	1986	0.6			
Plastisol Line 4114 curing oven	1986	0.12			
Cap Manufacturing curing ovens	1986	3.2			
Line 2805 curing oven	1986	6.0			
Line 2701 curing oven	1970	4.0	11.65	0.8681	326 IAC 6-2-3
Line 2702 curing oven	1970	4.65			
Line 2803 curing oven	1970	3.0			

[326 IAC 6-2-3]

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Actual Values

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal **50** μ/m^3 for a period not to exceed 60 minutes. — 50

a = Plume rise factor. The value **0.67** shall be used for Q less than or equal to 1000 MMBtu/hr. The value 0.8 shall be used for Q greater than 1000 MMBtu/hr. — 0.67

h = Stack height in feet. — 12.5

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr).

N = Number of stacks in fuel burning operation. — 1

[326 IAC 6-2-4]

$$Pt = \frac{1.09}{Q^{0.26}}$$ => 9/21/1983

Where: Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr).

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 15, 2016

Mr. Timothy R. White
Silgan White Cap Corporation
1190 Corporate Drive
Oconomowoc, WI 53066

Re: Public Notice
Silgan White Cap Corporation
Permit Level: Title V Operating Permit Renewal
Permit Number: 163-36869-00003

Dear Mr. White:

Enclosed is a copy of your draft Title V Operating Permit Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Evansville Courier in Evansville, Indiana publish the abbreviated version of the public notice no later than August 18, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Willard Library of Evansville, 21 First Avenue in Evansville, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Ms. Renee Traivaranon, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5615 or dial (317) 234-5615.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 15, 2016

Evansville Courier
PO Box 268
Evansville, IN 47702-0268

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Silgan White Cap Corporation, Vanderburgh County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 18, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Operating Permit Renewal
Permit Number: 163-36869-00003

Enclosure
PN Newspaper.dot 8/27/2015

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 15, 2016

To: Willard Library of Evansville

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Silgan White Cap Corporation
Permit Number: 163-36869-00003

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

August 15, 2016
Silgan White Cap Corporation
163-36869-00003

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016

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Carol S. Comer
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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

August 15, 2016

A 30-day public comment period has been initiated for:

Permit Number: **163-36869-00003**
Applicant Name: **Silgan White Cap Corporation**
Location: **Evansville, Vanderburgh County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Mail Code 61-53

IDEM Staff	VHAUN 8/15/2016 Silgan White Cap Corporation 163-36869-00003 DRAFT		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Timothy R White Silgan White Cap Corporation 1190 Corporate Dr Oconomowoc WI 53066 (Source CAATS)									
2		Philip Green Plant Mgr Silgan White Cap Corporation 2201 W Maryland St Evansville IN 47712 *(RO CAATS)*									
3		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 *(Local Official)*									
4		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 *(Local Official)*									
5		Willard Library of Evansville 21 First Ave Evansville IN 47710-1294 *(Library)*									
6		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)*									
7		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 *(Health Department)*									
8		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 *(Affected Party)*									
9		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 *(Affected Party)*									
10		John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
11											
12											
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14											
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