



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Significant Modification to a  
Part 70 Operating Permit

for MonoSol, LLC in LaPorte County

Significant Permit Modification No.: 091-36873-00138

The Indiana Department of Environmental Management (IDEM) has received an application from MonoSol, LLC, located at 1609 Genesis Drive, La Porte, Indiana 46350, for a significant modification of its Part 70 Operating Permit issued on February 5, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow MonoSol, LLC to make certain changes at its existing source. MonoSol, LLC has applied to construct and operate a new blown polyvinyl alcohol film extrusion line and convert the existing film cast line, identified as Semi-Works Line, to be permitted to operate as a part-time research and development line and a part-time production line.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

LaPorte County Public Library  
904 Indiana Avenue  
La Porte, IN 46350

and

IDEM Northwest Regional Office  
330 W. US Highway 30, Suites E & F  
Valparaiso, IN 46385

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 30<sup>th</sup> 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 SPM 091-36873-00138 in all correspondence.

**Comments should be sent to:**

Brandon Miller  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5374  
Or dial directly: (317) 234-5374  
Fax: (317) 232-6749 attn: Brandon Miller  
E-mail: [bmiller@idem.IN.gov](mailto:bmiller@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 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Brandon Miller or my staff at the above address.



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality



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## DRAFT

Ms. Melanie Kroczek  
MonoSol, LLC  
1609 Genesis Drive  
La Porte, Indiana 46350

Re: 091-36873-00138  
Significant Permit Modification to  
Part 70 Renewal No.: T091-36396-00138

Dear Ms. Kroczek:

MonoSol, LLC was issued Part 70 Operating Permit Renewal No. T091-36396-00138 on February 5, 2016, for a stationary plant that manufactures polyvinyl alcohol (PVOH) film located at 1609 Genesis Drive, La Porte, Indiana 46350. An application requesting changes to this permit was received on February 11, 2016. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

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

Attachment A: 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units

Attachment B: 40 CFR 63, Subpart DDDDD, National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

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

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl).

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

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If you have any questions on this matter, please contact Brandon Miller, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - LaPorte County  
LaPorte County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch  
IDEM Northwest Regional Office



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## Part 70 Operating Permit Renewal

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## OFFICE OF AIR QUALITY

**MonoSol, LLC  
1609 Genesis Drive  
La Porte, Indiana 46350**

(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.: T091-36396-00138	
Issued by: Original Signed Jason Krawczyk, Section Chief Permits Branch, Office of Air Quality	Issuance Date: February 5, 2016  Expiration Date: February 5, 2021

First Significant Permit Modification No.: 091-36873-00138	
Issued by:  Iryn Calilung Section Chief, Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: February 5, 2021

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Attachment A: 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units

Attachment B: 40 CFR 63, Subpart DDDDD - National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary stationary plant that manufactures polyvinyl alcohol (PVOH) film.

Source Address:	1609 Genesis Drive, La Porte, Indiana 46350
General Source Phone Number:	219-324-9459
SIC Code:	3081 (Unsupported Plastics Film and Sheet)
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) film casting line, identified as Line 7, constructed in 2008 and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 230 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting;
  - (4) A natural gas-fired drying oven with a total heat input capacity of 4.40 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-008 and V-0012.
  - (5) One (1) weigh hopper with a maximum throughput rate of 8,000 pounds per hour, controlled by fabric filter.
  
- (b) One (1) film casting line, identified as Line 8, approved in 2009 for construction and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 230 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 4.40 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-026 and V-028.
  
- (c) One (1) film casting line, identified as Line 9, approved in 2009 for construction and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and

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- (4) A natural gas-fired drying oven with a total heat input capacity of 6.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-033 and V-035.
- (d) One (1) film casting line, identified as Line 10, approved in 2009 for construction and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
    - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
    - (2) Interim process storage tanks;
    - (3) Film casting; and
    - (4) A natural gas-fired drying oven with a total heat input capacity of 6.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-034 and V-039.
  - (e) One (1) film casting line, identified as Line 11, approved in 2009 for construction and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
    - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
    - (2) Interim process storage tanks;
    - (3) Film casting; and
    - (4) A natural gas-fired drying oven with a total heat input capacity of 6.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-033 and V-035.
  - (f) One (1) film casting line, identified as Line 12, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
    - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
    - (2) Interim process storage tanks;
    - (3) Film casting; and
    - (4) A natural gas-fired drying oven with a total heat input capacity of 7.42 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-046 and V-048.
  - (g) One (1) film casting line, identified as Line 13, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
    - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
    - (2) Interim process storage tanks;
    - (3) Film casting; and
    - (4) A natural gas-fired drying oven with a total heat input capacity of 7.42 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-046 and V-048.
  - (h) One (1) film casting line, identified as Line 14, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
    - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
    - (2) Interim process storage tanks;
    - (3) Film casting; and
    - (4) A natural gas-fired drying oven with a total heat input of 7.42 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-069 and V-074.
  - (i) One (1) film casting line, identified as Line 15, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
    - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
    - (2) Interim process storage tanks;
    - (3) Film casting; and

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- (4) A natural gas-fired drying oven with a total heat input of 8.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-069 and V-074.
  
- (j) One (1) film casting line, identified as Line 16, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input of 8.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-047 and V-052.
  
- (k) One (1) film casting line, identified as Line 17, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input of 8.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-068 and V-070.
  
- (l) One (1) film casting line, identified as Line 18, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input of 8.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-068 and V-070.
  
- (m) One (1) film casting line, identified as L19, approved in 2014 for construction, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 440 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 29.0 MMBtu/hr, utilizing natural gas only, exhausting to stacks A, B, and C.
  
- (n) One (1) film casting line, identified as Semi-Works Line, constructed in 2014, approved in 2016 for running part-time for research and development purposes, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 110 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage;
  - (3) Film casting;
  - (4) A natural gas-fired drying oven with a total heat input capacity of 8.69 MMBtu/hr, utilizing natural gas only, Exhausting to stacks D, E, and F; and
  - (5) One (1) weigh hopper with a maximum throughput rate of 6,000 pounds per hour, controlled by fabric filters, and exhausting indoors.

Note: There are a total of fifty-two (52) interim process storage tanks that are used interchangeably, as necessary, for the film casting lines.

- (o) One (1) blown polyvinyl alcohol (PVOH) film extrusion line, identified as Extruder #6 (Line E6), approved in 2016 for construction, no control, consisting of the following:

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- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 200 pounds of PVOH resin per hour;
  - (2) One (1) extruder; and
  - (3) Air dried cooling line.
- (p) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) Four (4) natural gas-fired boilers, identified as #1, #2, #3 and #4, #1 was constructed in 2009 and #2, #3 and #4 were constructed in 2011, with a rated heat capacity of 8.3 MMBtu/hour, each.  
  
These are affected sources under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.
- (b) One (1) cooling tower, identified as Tower #1, constructed in 2011, with a counter-current, total circulating flow rate of 405 gallons of water per minute, no control, exhausting outdoors.
- (c) One (1) cooling tower, identified as Tower #2, constructed in 2011, with a counter-current, total circulating flow rate of 810 gallons of water per minute, no control, exhausting outdoors.
- (d) One (1) cooling tower, identified as Tower #3, constructed in 2011, with a counter-current, total circulating flow rate of 1,620 gallons of water per minute, no control, exhausting outdoors.
- (e) One (1) cooling tower, identified as Tower #4, approved in 2014 for construction, with a counter-current, total circulating flow rate of 1,620 gallons of water per minute, no control, exhausting outdoors.
- (f) Four (4) glycerine storage tanks, identified as Tanks 1 through 4, constructed in 2009, with a maximum storage capacity of 4,600 gallons each of glycerine, no control, exhausting indoors.
- (g) Four (4) glycerine storage tanks, identified as Tanks 5 through 8, constructed in 2009, with a maximum storage capacity of 4,600 gallons each of glycerine, no control, exhausting indoors.
- (h) Four (4) glycerine storage tanks, identified as Tanks 9 through 12, approved in 2014 for construction, with a maximum storage capacity of 4,600 gallons each of glycerine, no control, exhausting indoors.

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- (i) Sixty-one (61) insignificant comfort heating, constructed in 2009 and approved in 2014 for modification, burning natural gas, with a total heat input capacity of 55.3 MMBtu/hr, no control, and exhausting indoors.

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).

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## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, T091-36396-00138, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
  - (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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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).

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- (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 Northwest 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  
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

- (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.

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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

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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 T091-36396-00138 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).

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- (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.

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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

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and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(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.

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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.

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- (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.

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**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

**C.2 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

**C.6 Stack Height [326 IAC 1-7]**

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

**C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

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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.

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

#### C.8 Performance Testing [326 IAC 3-6]

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

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

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

- (b) 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

#### C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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- (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:

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

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. 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.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]**

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

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

**C.13 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]**

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

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]**

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Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;

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- (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**  
Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(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:

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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.17 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

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

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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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) film casting line, identified as Line 7, constructed in 2008 and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 230 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting;
  - (4) A natural gas-fired drying oven with a total heat input capacity of 4.40 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-008 and V-0012.
  - (5) One (1) weigh hopper with a maximum throughput rate of 8,000 pounds per hour, controlled by fabric filter.
  
- (b) One (1) film casting line, identified as Line 8, approved in 2009 for construction and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 230 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 4.40 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-026 and V-028.
  
- (c) One (1) film casting line, identified as Line 9, approved in 2009 for construction and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 6.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-033 and V-035.
  
- (d) One (1) film casting line, identified as Line 10, approved in 2009 for construction and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 6.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-034 and V-039.
  
- (e) One (1) film casting line, identified as Line 11, approved in 2009 for construction and modified in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 6.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-033 and V-035.
  
- (f) One (1) film casting line, identified as Line 12, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;

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- (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 7.42 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-046 and V-048.
- (g) One (1) film casting line, identified as Line 13, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 7.42 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-046 and V-048.
- (h) One (1) film casting line, identified as Line 14, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input of 7.42 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-069 and V-074.
- (i) One (1) film casting line, identified as Line 15, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input of 8.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-069 and V-074.
- (j) One (1) film casting line, identified as Line 16, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input of 8.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-047 and V-052.
- (k) One (1) film casting line, identified as Line 17, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input of 8.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-068 and V-070.
- (l) One (1) film casting line, identified as Line 18, constructed in 2011, approved in 2014 for modification, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 370 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage tanks;

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- (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input of 8.84 MMBtu/hr, utilizing natural gas only, exhausting to stacks V-068 and V-070.
- (m) One (1) film casting line, identified as L19, approved in 2014 for construction, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 440 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage;
  - (3) Film casting; and
  - (4) A natural gas-fired drying oven with a total heat input capacity of 29.0 MMBtu/hr, utilizing natural gas only, exhausting to stacks A, B, and C.
- (n) One (1) film casting line, identified as Semi-Works Line, constructed in 2014, approved in 2016 for running part-time for research and development purposes, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 110 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage;
  - (3) Film casting;
  - (4) A natural gas-fired drying oven with a total heat input capacity of 8.69 MMBtu/hr, utilizing natural gas only, Exhausting to stacks D, E, and F; and
  - (5) One (1) weigh hopper with a maximum throughput rate of 6,000 pounds per hour, controlled by fabric filters, and exhausting indoors.

Note: There are a total of fifty-two (52) interim process storage tanks that are used interchangeably, as necessary, for the film casting lines.

- (o) One (1) blown polyvinyl alcohol (PVOH) film extrusion line, identified as Extruder #6 (Line E6), approved in 2016 for construction, no control, consisting of the following:
- (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 200 pounds of PVOH resin per hour;
  - (2) One (1) extruder; and
  - (3) Air dried cooling line.
- (p) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

(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 Maximum Achievable Control Technology (MACT) for Hazardous Air Pollutants (HAP) [326 IAC 2-4.1]

Pursuant to 326 IAC 2-4.1, (Major Sources of Hazardous Air Pollutants (HAP)) and 091-27326-00138, issued on May 6, 2009, for Lines 7 and 8, and 091-30236-00138, issued on July 28, 2011,

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for Lines 9 through 18, and SSM 091-34431-00018 for Line 19 and Semi-Works Line, the MACT for these units shall be the following:

- (a) The methanol (MeOH) content in the resin feed shall not exceed 3% methanol, by weight, with a 12-month rolling average of 1.25% or less methanol in the resin feed for each line.

Pursuant to 326 IAC 2-4.1(b)(4), the Semi-Works Line is subject to this requirement only when operating as a production unit and not when it operates as a research and development line.

#### D.1.2 Volatile Organic Compounds Limitations [326 IAC 8-1-6][326 IAC 2-2]

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- (a) In order to render 326 IAC 8-1-6 not applicable, the VOC emissions from the drying processes from the film casting lines identified as Line 7 through Line 19 shall not exceed 24.77 tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

Compliance with Condition D.1.2(a) shall limit each Line 7 through Line 19 to less than twenty-five (25) tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

- (b) In order to render 326 IAC 2-2 not applicable, the total VOC emissions from the following processes, not including VOC emissions from the combustion of natural gas in the drying ovens:
  - (i) film casting lines, Lines 7 through Line 19;
  - (ii) Semi-Works Line; and
  - (iii) blown PVOH film extruder line, identified as Extruder #6 (Line E6),

shall not exceed 244.54 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance Condition D.1.2(b), combined with the potential to emit VOC from other emission units at the source, shall limit the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Condition D.1.2(b) includes emissions from the Semi-Works Line even when it operates for research and development purposes.

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

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- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the Weigh Hopper for Line 7 shall not exceed 10.126 pounds per hour when operating at a process weight rate of four (4) 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:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the Weigh Hopper for Semi-Works Line shall not exceed 8.56 pounds per hour when operating at a process weight rate of three (3) 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

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per hour shall be accomplished by use of the equation:

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

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

#### D.1.5 Volatile Organic Compounds (VOC)

- (a) Lines 7 through Line 19 and Semi-Works Line  
In order to demonstrate compliance with Condition D.1.1, the Permittee shall determine the average methanol content on a monthly basis using the following equation:

$$\text{Average Methanol Content} = \frac{\sum (\text{PVOH Resin MeOH Content } (\%)_r \times \text{PVOH Resin Usage (pounds)}_r)}{\text{Total PVOH Resin Usage (pounds) for the compliance period}}$$

where  $r$  = resin lot number used in the compliance period

- (b) Lines 7 through 19  
In order to demonstrate compliance with Condition D.1.2(a), the Permittee shall determine VOC emissions from each film cast line drying process on a monthly basis using the following equation:

$$\text{VOC Emissions per Film Cast Line Drying Process (tons/month)} = \sum \text{PVOH Resin Usage (pounds/month)}_r \times \text{PVOH Resin MeOH Content } (\%)_r \times 1 \text{ ton}/2,000 \text{ lbs}$$

where  $r$  = resin lot number

- (c) Lines 7 through Line 19 and Semi-Works Line  
In order to demonstrate compliance with Condition D.1.2(b), the Permittee shall determine VOC emissions from the film cast lines drying process on a monthly basis using the following equation:

$$\text{VOC Emissions from the Film Cast Line Drying Process (tons/month)} = \sum [\sum \text{PVOH Resin Usage per line (pounds/month)}_r \times \text{PVOH Resin MeOH Content } (\%)_r \times 1 \text{ ton}/2,000 \text{ lbs}]_n$$

where  $r$  = resin lot number; and  
 $n$  = line number

- (d) Blown PVOH film extrusion line (Line E6)  
In order to demonstrate compliance with Condition D.1.2(b), the Permittee shall determine VOC emissions from the blown PVOH film extrusion line on a monthly basis using the following equation:

$$\text{VOC Emissions from the Blown PVOH film extrusion line (tons/month)} = \sum (\text{Emission Factor}_i \times (\text{PVOH Methanol Content Percentage}_i / (0.65\%)) \times (150\% \text{ safety factor}) \times (\text{hours operated}_i) \times (1 \text{ ton} / 2,000 \text{ lbs}))$$

Where  $r$  = resin lot number; and  
 $i$  = emission factor for 0.65% methanol content

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#### D.1.6 Hazardous Air Pollutants (HAP)

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Compliance with the methanol (MeOH) content limits contained in Condition D.1.1 shall be determined pursuant to 326 OAC 20-1 by obtaining from the manufacturer copies of the certificate(s) of analysis (COA) that provide as-supplied resin MeOH content or by using standard analytical test methods to determine resin MeOH content. IDEM OAQ reserves the authority to determine compliance using an approved test method in conjunction with analytical procedures specified in 326 IAC 20-1.

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

#### D.1.7 Record Keeping Requirement

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain monthly records of VOC/methanol content of the resin used in the film casting lines identified as Lines 7 through 19, Semi-Works Line and blown PVOH film extrusion line (Line E6).
- (b) To ensure compliance with Condition D.1.1, the Permittee shall maintain monthly records of the following when the Semi-Works Line is operating for research and development:
  - (i) Date when research and development run begins;
  - (ii) Date when research and development run ends;
  - (iii) Resin Lot Numbers used during research and development; and
  - (iv) Records of what happens to the material created during research and development, such as if all of the material is destroyed during research and development or if any of the material is sold or exchanged for commercial profite in a de minimis manner.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### D.1.8 Reporting Requirements

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

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**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

(p) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

**Insignificant Units:**

(a) Four (4) natural gas-fired boilers, identified as #1, #2, #3 and #4, #1 was constructed in 2009 and #2, #3 and #4 were constructed in 2011, with a rated heat capacity of 8.3 MMBtu/hour, each.

These are affected sources under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

(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.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2]**

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emissions Limitations), particulate emissions from the natural gas-fired boilers shall not exceed the following:

Boiler	Year Approved for Constructed	Q (MMBtu/hr)	Pt (lb/MMBtu)
Boiler #1	2009	8.3	0.60
Boiler #2	2011	33.2	0.44
Boiler #3	2011	33.2	0.44
Boiler #4	2011	33.2	0.44
Boiler #5	2014	45.6	0.404

This limitation was calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

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

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

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

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## SECTION E.1 EMISSION UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (p) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

### Insignificant Activity:

- (a) Four (4) natural gas-fired boilers, identified as #1, #2, #3 and #4, #1 was constructed in 2009 and #2, #3 and #4 were constructed in 2011, with a rated heat capacity of 8.3 MMBtu/hour, each.

These are affected sources under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP)[326 IAC 2-7-5(1)]

#### E.1.1 General Provisions Relating to NESHAP DDDDD [326 IAC 20-1-1][40 CFR 63, Subpart A]

- (a) Pursuant to 40 CFR 63.7565, the Permittee shall comply with the applicable provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR 63, Subpart DDDDD (included as Attachment B of this permit).

- (b) Pursuant to 40 CFR 63.9 and 63.10, the Permittee shall submit all required notifications and reports, to:

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

and

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

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E.1.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [326 IAC 20-95][40 CFR 63, Subpart DDDDD]

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The Permittee which has industrial, commercial, and institutional boilers and process heaters shall comply with the applicable provisions of 40 CFR Part 63, Subpart DDDDD, which are incorporated by reference as 326 IAC 20-95, as follows:

- (1) 40 CFR 63.7480
- (2) 40 CFR 63.7485
- (3) 40 CFR 63.7490
- (4) 40 CFR 63.7495(a), (b), and (d)
- (5) 40 CFR 63.7499(l)
- (6) 40 CFR 63.7500(a)(1), (a)(3), (b), (e), and (f)
- (7) 40 CFR 63.7501
- (8) 40 CFR 63.7505
- (9) 40 CFR 63.7515(d)
- (10) 40 CFR 63.7530(d), (e), and (f)
- (11) 40 CFR 63.7540 (a)(10)(i-vi), (a)(11), (a)(13) and (b)
- (12) 40 CFR 63.7545(a), (b), (c), (e), and (f)
- (13) 40 CFR 63.7550(a), (b), (c)(1), (c)(5)(i-iv and xiv), and (h)(3)
- (14) 40 CFR 63.7555
- (15) 40 CFR 63.7560
- (16) 40 CFR 63.7565
- (17) 40 CFR 63.7570
- (18) 40 CFR 63.7575
- (19) Table 3 to Subpart DDDDD of Part 63—Work Practice Standards
- (20) Table 9 to Subpart DDDDD of Part 63—Reporting Requirements
- (21) Table 10 to Subpart DDDDD of Part 63—Applicability of General Provisions to Subpart DDDDD

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## SECTION E.2 EMISSION UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (p) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

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

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

#### E.2.1 General Provisions Relating to NSPS Dc [326 IAC 12-1][40 CFR 60, Subpart A]

- (a) Pursuant to 40 CFR 60.48c, the Permittee shall comply with the applicable provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1-1, as specified in 40 CFR 60, Subpart Dc (included as Attachment A of this permit).
- (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:

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

and

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

#### E.2.2 Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units [326 IAC 12-1][40 CFR 60, Subpart Dc]

The Permittee which has industrial, commercial, and institutional boilers and process heaters shall comply with the applicable provisions of 40 CFR Part 60, Subpart Dc, which are incorporated by reference as 326 IAC 12-1, as follows:

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

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

Source Name: MonoSol, LLC  
Source Address: 1609 Genesis Drive, La Porte, Indiana 46350  
Part 70 Permit No.: T091-36396-00138

**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:

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**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: MonoSol, LLC  
Source Address: 1609 Genesis Drive, La Porte, Indiana 46350  
Part 70 Permit No.: T091-36396-00138

**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:

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Part 70 Usage Report**

(Submit Report Quarterly)

Source Name: MonoSol, LLC  
 Source Address: 1609 Genesis Drive, La Porte, Indiana 46350  
 Part 70 Permit No.: T091-36396-00138  
 Facility: Drying Process from Film Cast Lines 7 through 19 and Semi-Works Line; and Blown PVOH Film Extrusion Line (Extruder #6 (Line E6))  
 Parameter: VOC Emissions  
 Limit: 24.77 tons, for each line from Line 7 through Line 19, and total 244.54 tons per twelve (12) consecutive month period for Line 7 through Line 19, the Semi-Works Line, and Line E6

The equations for calculating the emissions are found in Condition D.1.5.

QUARTER :

YEAR:

Month	Line 7	Line 8	Line 9	Line 10	Line 11	Line 12	Line 13	Line 14	Line 15	Line 16	Line 17	Line 18	Line 19	Semi-Works	Line E6

Month	Total VOC Emissions from Film Cast Lines (tons)	VOC Usage (tons) Previous 11 Months	VOC Usage (tons) 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: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: MonoSol, LLC  
 Source Address: 1609 Genesis Drive, La Porte, Indiana 46350  
 Part 70 Permit No.: T091-36396-00138  
 Facility: PVOH Resin Feed (Lines 7 to 19 and Semi Works Line)  
 Parameter: Weight Percentage of Methanol  
 Limit: Not to exceed 3% methanol, by weight, with a 12-month rolling average of 1.25% methanol in the resin feed.

QUARTER :

YEAR:

Month	Line 7		Line 8		Line 9		Line 10		Line 11		Line 12		Line 13	
	A	B	A	B	A	B	A	B	A	B	A	B	A	B

Month	Line 14		Line 15		Line 16		Line 17		Line 18		Line 19		Semi-Works	
	A	B	A	B	A	B	A	B	A	B	A	B	A	B

Where: A is Maximum Methanol Content of Resin Feed; and  
 B is Average Methanol Content of Resin Feed as calculated by the equation in Condition D.1.5(a)

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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**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: MonoSol, LLC  
Source Address: 1609 Genesis Drive, La Porte, Indiana 46350  
Part 70 Permit No.: T091-36396-00138

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

Page 1 of 2

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

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

**Source Description and Location**

Source Name:	MonoSol, LLC
Source Location:	1609 Genesis Drive, La Porte, Indiana 46350
County:	LaPorte
SIC Code:	3081 (Unsupported Plastics Film and Sheet)
Operation Permit No.:	T 091-36396-00138
Operation Permit Issuance Date:	February 5, 2016
Minor Source Modification No.:	091-36824-00138
Significant Permit Modification No.:	091-36873-00138
Permit Reviewer:	Brandon Miller

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. 091-36824-00138 on February 5, 2016. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in LaPorte County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Unclassifiable or attainment effective November 15, 1990, for the 1-hour standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
LaPorte County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
LaPorte County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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

**Source Status - Existing Source**

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

<b>Pollutant</b>	<b>Emissions (ton/yr)</b>
PM	2.25
PM <sub>10</sub>	7.77
PM <sub>2.5</sub>	7.77
SO <sub>2</sub>	0.58
NO <sub>x</sub>	96.85
VOC	249.33
CO	81.35
<b>HAPs</b>	
Methanol	244.00
Hexane	1.74
<b>Total</b>	<b>245.83</b>

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of 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).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based upon the limited potential to emit (PTE) from the TSD to the Part 70 Renewal (No. T091-36396-00138).
- (d) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

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

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by MonoSol, LLC on February 11, 2016, relating to the following changes:

- (1) Construct and operate a new blown PVOH (polyvinyl alcohol) film extrusion line; and
- (2) Convert the existing film cast line identified as Semi-Works Line to be permitted to operate as a part-time research and development line and a part-time production line.

The following is a list of the proposed emission units:

- (a) One (1) blown polyvinyl alcohol (PVOH) film extrusion line, identified as Extruder #6 (Line E6), approved in 2016 for construction, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 200 pounds of PVOH resin per hour;
  - (2) One (1) extruder; and
  - (3) Air dried cooling line.

The following is a list of the modified emission units:

- (a) One (1) film casting line, identified as Semi-Works Line, constructed in 2014, approved in 2016 for running part-time for research and development purposes, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 110 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage;
  - (3) Film casting;
  - (4) A natural gas-fired drying oven with a total heat input capacity of 8.69 MMBtu/hr, utilizing natural gas only, Exhausting to stacks D, E, and F; and
  - (5) One (1) weigh hopper with a maximum throughput rate of 6,000 pounds per hour, controlled by fabric filters, and exhausting indoors.

### Enforcement Issues

IDEM is aware that there is a pending enforcement action for exceeding the maximum methanol content limit in the resin feed. IDEM is reviewing this matter and will take the appropriate action.

### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

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

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

<b>Increase in PTE Before Controls of the Modification*</b>	
<b>Pollutant</b>	<b>Potential To Emit (ton/yr)</b>
PM	0.13
PM <sub>10</sub>	0.13
PM <sub>2.5</sub>	0.13
SO <sub>2</sub>	-
VOC	1.72
CO	-
NO <sub>x</sub>	-
Single HAPs	1.72 Methanol
Total HAPs	1.72

\*PTE of the new emission unit only. The modification to the Semi-Works Line does not involve an increase in the PTE since research and development is exempt pursuant to 326 IAC 2-1.1-3(e)(2).

- (a) **Approval to Construct**  
 This source modification is subject to 326 IAC 2-7-10.5(e)(1) because the potential to emit the criteria pollutants is less than the thresholds listed for a significant source modification in 326 IAC 2-7-10.5(g)(4) and less than the single HAP and combination of HAPs threshold listed in 326 IAC 2-7-10.5(g)(6) and it is higher than the thresholds listed for an administrative amendment for a single HAP as listed in 326 IAC 2-7-11(a)(8)(A) and in 326 IAC 2-7-11(a)(8)(B).
- (b) **Approval to Operate**  
 Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1) because it does not qualify as an administrative amendment because it incorporates an emission unit that does not qualify as an exempt unit under 326 IAC 2-7-11(a)(8)(A) or as an insignificant activity under 326 IAC 2-7-11(a)(8)(B) and it does not qualify as a minor permit modification under 326 IAC 2-7-12(b)(1)(E) because there will be specific case-by-case emission limitations to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, which are Title I changes under the Clean Air Act (CAA).

**Permit Level Determination – PSD**

Prior to this modification, the existing source was a PSD minor source with a VOC limit of 244 tons per twelve (12) consecutive month periods for the PVOH resin usage in the film casting lines. The source is going to maintain the existing PSD minor limits for VOC by incorporating the new blown PVOH film extrusion line into the existing VOC limit and raising the limit from 244 tons per twelve (12) consecutive month periods to 244.54 tons per twelve (12) consecutive month periods. The source will limit VOC based on the following limit. The limitations for the new emission unit will maintain the PSD minor status (see table in PTE of the Entire Source After Issuance of the Modification).

- (a) In order to render 326 IAC 2-2 (PSD) not applicable, the total VOC emissions from the drying processes from the film casting lines, identified as Line 7 through Line 19 and the Semi-Works Line, and from the blown PVOH film extrusion line, identified as Extruder #6 (Line E6), shall not exceed 244.54 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

**PTE of the Entire Source After Issuance of the Modification**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 minor source and significant permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Resin Powder Handling	2.15	2.15	2.15	0.0	0.0	0.0	0.0	0.0	0.0
Extruder #6 (Line E6)	0.04	0.04	0.04	0.0	0.0	244.54 (limit)	0.0	244.54 (limit)	244.54 (limit)
Film Cast Lines Drying Process	0.0	0.0	0.0	0.0	0.0		0.0		
Weigh Hoppers (L7, Semi-Works)	21.46	21.46	21.46	0.0	0.0	0.0	0.0	0.0	0.0
Dryer Ovens Combustion	1.02	4.07	4.07	0.32	53.52	2.94	44.95	1.01	0.96 (Hexane)
Cooling Towers	0.18	0.18	0.18	0.0	0.0	0.0	0.0	0.0	0.0
Boilers	0.37	1.49	1.49	0.12	19.58	1.08	16.45	0.37	0.35 (Hexane)
Bulk Storage Tanks	0.0	0.0	0.0	0.0	0.0	negl.	0.0	0.0	0.0
Insignificant Heaters	0.45	1.80	1.80	0.14	23.75	1.31	19.95	0.45	0.43 (Hexane)
<b>Total PTE of Entire Source</b>	<b>25.67</b>	<b>31.19</b>	<b>31.19</b>	<b>0.58</b>	<b>96.85</b>	<b>249.87</b>	<b>81.35</b>	<b>246.37</b>	<b>244.54 (Methanol)</b>
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 <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

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

The PTE of PM, PM10, and PM2.5 were listed in the previous permit as being limited but there were no enforceable limits or practically enforceable control requirements contained within the permit to limit the PTE.

**Federal Rule Applicability Determination**

The following federal rules are applicable to the source due to this modification.

**NSPS:**

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

**NESHAP:**

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

**CAM:**

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 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 new or modified emission unit involved:

<b>CAM Applicability Analysis</b>							
<b>Emission Unit</b>	<b>Control Device Used</b>	<b>Emission Limitation (Y/N)</b>	<b>Uncontrolled PTE (ton/yr)</b>	<b>Controlled PTE (ton/yr)</b>	<b>Part 70 Major Source Threshold (ton/yr)</b>	<b>CAM Applicable (Y/N)</b>	<b>Large Unit (Y/N)</b>
Extruder #6 (Line E6) – All criteria pollutants and HAPs	This line is not subject to CAM because it does not have control devices.						

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

**State Rule Applicability Determination**

The following state rules are applicable to the source due to the modification:

**326 IAC 2-2 (PSD)**

PSD applicability is discussed under the Permit Level Determination – PSD section.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of the blown PVOH film extrusion line, identified as Extruder #6 (Line E6), will emit 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 does not apply to the new line.

**Blown PVOH Extrusion Film Line (Extruder #6 (Line E6))**

(a) 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-1(b)(14), the handling of resin for Extruder #6 (Line E6) is exempt from the requirements of 326 IAC 6-3-2, because the potential to emit particulate for the handling of resin for Extruder #6 (Line E6) is less than 0.551 pounds per hour.

- (b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
Extruder #6 (Line E6) has potential VOC emissions less than twenty-five (25) tons per year and are not otherwise regulated by another Article 8 rule, 326 IAC 20-48, or 326 IAC 20-56. Therefore, the requirements of 326 IAC 8-1-6 do not apply to Extruder #6 (Line E6).

### **Semi-Works Line**

- (a) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
Pursuant to 326 IAC 2-4.1(b)(4), this rule excluded research and development activities. To ensure compliance with the definition of research and development activities, the Permittee shall keep monthly records of the following items:
- (i) Date when research and development run begins;
  - (ii) Date when research and development run ends;
  - (iii) Resin Lot Numbers used during research and development; and
  - (iv) Records of what happens to the material created during research and development, such as if all of the material is destroyed during research and development activities or if any of the material is sold or exchanged for commercial profit in a de minimis manner.

Material sold or exchanged for commercial profit not in a de minimis manner is considered production and is subject to the existing VOC and Methanol Content limitations as described in the existing permit. These records do not need to be reported to IDEM but should be available based on existing general record keeping requirements within the permit.

### **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.

- (a) There are no new Compliance Determination Requirements applicable to this modification.
- (b) There are no testing requirements for the facilities at this source and none are being added as a result of this revision. The Permittee is required to keep records of the amount of VOC and the Methanol Content used in the film casting lines and blown PVOH film extrusion line.

### **Proposed Changes**

The changes listed below have been made to Part 70 Operating Permit No. 091-36396-00138. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- (a) The spelling of the city of La Porte was incorrect. IDEM, OAQ corrected the spelling in the address of the source throughout the permit. The spelling of LaPorte County is correct in the permit.
- (b) Section A.1 has been updated to include the description for the SIC Code for this source.

- (c) Section A.2 and Section D.1 has been updated to include the description updates for the Semi-Works Line and the new blown PVOH film extrusion line (Extruder #6 (Line E6)). Due to changes in numbering of the emission units in Section A.2, the numbering in Sections D.2, E.1, and E.2 have been updated as well.
- (d) Condition D.1.1 has been updated to not include the Semi-Works Line when the Semi-Works Line operates for research and development purposes.
- (e) Condition D.1.2(a) has been updated to explain what is being limited and what rule applicability is rendered not applicable.
- (f) Condition D.1.2(b) has been updated to include the new blown PVOH film extrusion line and to increase the VOC emission limit from 244.0 tons to 244.54 tons. A clarifying statement has been included to indicate that the Semi-Works Line is included at all times, even when operating for research and development activities. A clarifying statement has been included to indicate that the VOCs from the combustion of natural gas is not included.
- (g) Condition D.1.5 has been updated to include an averaging equation for clarity of the methodology of demonstrating compliance.
- (h) Condition D.1.5 has been updated to include the equation for calculating the blown PVOH film extrusion line emissions. Condition D.1.5 has been updated to allow for the Semi-Works Line operations to not be included when the Semi-Works Line operates for research and development purposes.
- (i) Condition D.1.5 has been updated to reference the Permittee instead of the source to more accurately match up with the permit terminology.
- (j) Condition D.1.7 has been updated to include recordkeeping requirements for when the Semi-Works Line operates for research and development purposes. This includes information that will be necessary to ensure that while the line is operating as research and development that materials created will not be used for production.
- (k) Conditions E.1.1(a) and E.2.1(a) have been updated to identify that the attachments are in reference to what is included in the permit and not an outside location.
- (l) The Quarterly Part 70 Usage Report has been updated to include the references to the equations in the permit (Condition D.1.5) and to include a new column for the blown PVOH film extrusion line (Extruder #6 (Line E6)).

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

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...  
Source Address: 1609 Genesis Drive, LaPorteLa Porte, Indiana 46350  
General Source Phone Number: 219-324-9459  
SIC Code: 3081 (**Unsupported Plastics Film and Sheet**)

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

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

- ...
- (n) One (1) film casting line, identified as Semi-Works Line, ~~approved in 2014 for construction~~ **constructed in 2014, approved in 2016 for running part-time for research and development purposes**, no control, consisting of the following:
    - (1) Raw material mixing and blending, in an enclosed system, with a maximum

- throughput rate of 110 pounds of polyvinyl alcohol resin per hour;
- (2) Interim process storage;
- (3) Film casting;
- (4) A natural gas-fired drying oven with a total heat input capacity of 8.69 MMBtu/hr, utilizing natural gas only, Exhausting to stacks D, E, and F; and
- (5) One (1) weigh hopper with a maximum throughput rate of 6,000 pounds per hour, controlled by fabric filters, and exhausting indoors.

Note: There are a total of fifty-two (52) interim process storage tanks that are used interchangeably, as necessary, for the film casting lines.

- (o) **One (1) blown polyvinyl alcohol (PVOH) film extrusion line, identified as Extruder #6 (Line E6), approved in 2016 for construction, no control, consisting of the following:**
  - (1) **Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 200 pounds of PVOH resin per hour;**
  - (2) **One (1) extruder; and**
  - (3) **Air dried cooling line.**
- (ep) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

...

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (n) One (1) film casting line, identified as Semi-Works Line, ~~approved in 2014 for construction~~ **constructed in 2014, approved in 2016 for running part-time for research and development purposes**, no control, consisting of the following:
  - (1) Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 110 pounds of polyvinyl alcohol resin per hour;
  - (2) Interim process storage;
  - (3) Film casting;
  - (4) A natural gas-fired drying oven with a total heat input capacity of 8.69 MMBtu/hr, utilizing natural gas only, Exhausting to stacks D, E, and F; and
  - (5) One (1) weigh hopper with a maximum throughput rate of 6,000 pounds per hour, controlled by fabric filters, and exhausting indoors.

Note: There are a total of fifty-two (52) interim process storage tanks that are used interchangeably, as necessary, for the film casting lines.

- (o) **One (1) blown polyvinyl alcohol (PVOH) film extrusion line, identified as Extruder #6 (Line E6), approved in 2016 for construction, no control, consisting of the following:**
  - (1) **Raw material mixing and blending, in an enclosed system, with a maximum throughput rate of 200 pounds of PVOH resin per hour;**
  - (2) **One (1) extruder; and**

**(3) Air dried cooling line.**

- (ep) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

(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 Maximum Achievable Control Technology (MACT) for Hazardous Air Pollutants (HAP) [326 IAC 2-4.1]

Pursuant to 326 IAC 2-4.1, (Major Sources of Hazardous Air Pollutants (HAP)) and 091-27326-00138, issued on May 6, 2009, for Lines 7 and 8, and 091-30236-00138, issued on July 28, 2011, for Lines 9 through 18, and SSM 091-34431-00018 for Line 19 and Semi-Works Line, the MACT for these units shall be the following:

- (a) The methanol (MeOH) content in the resin feed shall not exceed 3% methanol, by weight, with a 12-month rolling average of 1.25% or less methanol in the resin feed for each line.

**Pursuant to 326 IAC 2-4.1(b)(4), the Semi-Works Line is subject to this requirement only when operating as a production unit and not when it operates as a research and development line.**

D.1.2 Volatile Organic Compounds Limitations [326 IAC 8-1-6][326 IAC 2-2]

- (a) In order to render 326 IAC 8-1-6 not applicable, the VOC emissions from the drying processes from the film casting lines identified as Line 7 through Line 19 shall not exceed 24.77 tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

**Compliance with Condition D.1.2(a) shall limit each Line 7 through Line 19 to less than twenty-five (25) tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.**

- (b) In order to render 326 IAC 2-2 not applicable, the total VOC emissions from the drying following processes, **not including VOC emissions from the combustion of natural gas in the drying ovens** from the:

- (i) film casting lines, identified as Line 7 through Line 19;  
(ii) ~~and the Semi-Works Line;~~ **and**  
(iii) **blown PVOH film extruder line, identified as Extruder #6 (Line E6),**

shall not exceed 244.54 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

~~Compliance with Condition D.1.2(a) shall limit each Line 7 through Line 19 to less than twenty-five (25) tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.~~

Compliance Condition D.1.2(b), combined with the potential to emit VOC from other

emission units at the source, shall limit the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**Condition D.1.2(b) includes emissions from the Semi-Works Line even when it operates for research and development purposes.**

...

**D.1.5 Volatile Organic Compounds (VOC)**

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- (a) **Lines 7 through 19 and Semi-Works Line**  
In order to demonstrate compliance with Condition D.1.1, the Permittee shall determine the average methanol content on a monthly basis using the following equation:

**Average Methanol Content =  $\Sigma$  (PVOH Resin MeOH Content (%)<sub>r</sub> x PVOH Resin Usage (pounds)<sub>r</sub>) / Total PVOH Resin Usage (pounds) for the compliance period**

where r = resin lot number used in the compliance period

- (b) **Lines 7 through 19**  
In order to demonstrate compliance with Conditions D.1.2(a), the ~~source~~ Permittee shall determine VOC emissions from each film cast line drying process on a monthly basis using the following equation:

VOC Emissions per Film Cast Line Drying Process (tons/month) =  $\Sigma$  PVOH Resin Usage (pounds/month)<sub>r</sub> x PVOH Resin MeOH Content (%)<sub>r</sub> x 1 ton/2,000 lbs

where r = resin lot number

- (bc) **Lines 7 through 19 and Semi-Works Line**  
In order to demonstrate compliance with Condition D.1.2(b), the ~~source~~ Permittee shall determine VOC emissions from the film cast lines drying process on a monthly basis using the following equation:

VOC Emissions from the Film Cast Line Drying Process (tons/month) =  $\Sigma$  [ $\Sigma$  PVOH Resin Usage per line (pounds/month)<sub>r</sub> x PVOH Resin MeOH Content (%)<sub>r</sub> x 1 ton/2,000 lbs]<sub>n</sub>

where r = resin lot number; and  
n = line number

- (d) **Blown PVOH film extrusion line (Line E6)**  
In order to demonstrate compliance with Condition D.1.2(b), the Permittee shall determine VOC emissions from the blown PVOH film extrusion line on a monthly basis using the following equation:

**VOC Emissions from the Blown PVOH film extrusion line (tons/month) =  $\Sigma$  (Emission Factor<sub>i</sub>) x ((PVOH Methanol Content Percentage) / (0.65%)) x (150% safety factor) x (hours operated<sub>i</sub>) x (1 ton / 2,000 lbs)**

Where r = resin lot number; and  
i = emission factor for 0.65% methanol content

...

**D.1.7 Record Keeping Requirement**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain monthly records of VOC/methanol content of the resin used in the film casting lines

identified as Lines 7 through 19 and the Semi-Works Line, and blown PVOH film extrusion line (Line E6).

- (b) To ensure compliance with Condition D.1.1, the Permittee shall maintain monthly records of the following when the Semi-Works Line is operating for research and development:
- (i) Date when research and development run begins;
  - (ii) Date when research and development run ends;
  - (iii) Resin Lot Numbers used during research and development; and
  - (iv) Records of what happens to the material created during research and development, such as if all of the material is destroyed during research and development or if any of the material is sold or exchanged for commercial profit in a de minimis manner.
- (bc) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

...

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (ep) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

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...

## SECTION E.1 EMISSION UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (ep) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

...

### E.1.1 General Provisions Relating to NESHAP DDDDD [326 IAC 20-1-1][40 CFR 63, Subpart A]

- (a) Pursuant to 40 CFR 63.7565, the Permittee shall comply with the applicable provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR 63, Subpart DDDDD (included as Attachment B of this permit).

...

SECTION E.2 EMISSION UNIT OPERATION CONDITIONS

Emissions Unit Description:

(ep) One (1) natural gas-fired boiler, identified as #5, approved in 2014 for construction, with a rated heat capacity of 12.4 MMBtu/hr, no control.

This is an affected unit under the New Source Performance Standards for Small Industrial, Commercial, and Institutional Steam Generating Units, 40 CFR 60, Subpart Dc.

This is an affected unit under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD.

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

...

E.2.1 General Provisions Relating to NSPS Dc [326 IAC 12-1][40 CFR 60, Subpart A]

- (a) Pursuant to 40 CFR 60.48c, the Permittee shall comply with the applicable provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1-1, as specified in 40 CFR 60, Subpart Dc (included as Attachment A **of this permit**).

...

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

Source Name: MonoSol, LLC  
Source Address: 1609 Genesis Drive, LaPorteLa Porte, Indiana 46350

...

PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT

Source Name: MonoSol, LLC  
Source Address: 1609 Genesis Drive, LaPorteLa Porte, Indiana 46350

...

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: MonoSol, LLC  
Source Address: 1609 Genesis Drive, LaPorteLa Porte, Indiana 46350  
Part 70 Permit No.: T091-36396-00138  
Facility: Drying Process from Film Cast Lines 7 through 19 and Semi-Works Line; and Blown PVOH Film Extrusion Line (Extruder #6 (Line E6))  
Parameter: VOC Emissions




Where: A is Maximum Methanol Content of Resin Feed; and  
B is Average Methanol Content of Resin Feed- **as calculated by the equation in Condition D.1.5(a)**

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on:

...

### QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: MonoSol, LLC  
Source Address: 1609 Genesis Drive, La Porte, Indiana 46350

...

<b>Conclusion and Recommendation</b>
--------------------------------------

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 091-36824-00138 and Significant Permit Modification No. 091-36873-00138. The staff recommends to the Commissioner that this Part 70 Minor Source and Significant Permit Modification be approved.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Brandon Miller at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (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>.

### Appendix A: Summary of Emission Calculations

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138  
**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

#### Uncontrolled Potential Emissions (ton/year)

	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2e</sub>	Total HAP	Worst Single HAP
Dry Powder Handling	2.15	2.15	2.15	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Extruder #6 (Line E6)	0.04	0.04	0.04	0.0	0.0	1.72	0.0	0.0	1.72	1.72 Methanol
Film Cast Line Drying Process	0.0	0.0	0.0	0.0	0.0	618.89	0.0	0.0	618.89	618.89 Methanol
Weigh Hoppers-L7, Semi Works	21.46	21.46	21.46	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Dryer Ovens Combustion	1.02	4.07	4.07	0.32	53.52	2.94	44.95	64,603	1.01	0.96 Hexane
Cooling Towers	0.18	0.18	0.18	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Boilers	0.37	1.49	1.49	0.12	19.58	1.08	16.45	23,637	0.37	0.35 Hexane
Bulk Storage Tanks	0.0	0.0	0.0	0.0	0.0	2.15E-04	0.0	0.0		0.0
Insignificant Heaters	0.45	1.80	1.80	0.14	23.75	1.31	19.95	28,665	0.45	0.43 Hexane
<b>Total</b>	<b>25.67</b>	<b>31.19</b>	<b>31.19</b>	<b>0.58</b>	<b>96.85</b>	<b>625.94</b>	<b>81.35</b>	<b>116,905</b>	<b>622.44</b>	<b>620.61 Methanol</b>

#### Limited Potential Emissions (ton/year)

	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2e</sub>	Total HAP	Worst Single HAP
Dry Powder Handling	2.15	2.15	2.15	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Extruder #6 (Line E6)	0.04	0.04	0.04	0.0	0.0	0.54	0.0	0.0	0.54	0.54 Methanol
Film Cast Line Drying Process	0.0	0.0	0.0	0.0	0.0	244.00	0.0	0.0	244.00	244.00 Methanol
Weigh Hoppers-L7, Semi Works	21.46	21.46	21.46	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Dryer Ovens Combustion	1.02	4.07	4.07	0.32	53.52	2.94	44.95	64,603	1.01	0.96 Hexane
Cooling Towers	0.18	0.18	0.18	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Boilers	0.37	1.49	1.49	0.12	19.58	1.08	16.45	23,637	0.37	0.35 Hexane
Bulk Storage Tanks	0.0	0.0	0.0	0.0	0.0	2.15E-04	0.0	0.0	0.0	0.0
Insignificant Heaters	0.45	1.80	1.80	0.14	23.75	1.31	19.95	28,665	0.45	0.43 Hexane
<b>Total</b>	<b>25.67</b>	<b>31.19</b>	<b>31.19</b>	<b>0.58</b>	<b>96.85</b>	<b>249.86</b>	<b>81.35</b>	<b>116,905</b>	<b>246.37</b>	<b>244.54 Methanol</b>

**Appendix A: Emissions Calculations  
Summary of Modification Prior to Limitations**

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138  
**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

**New Processes (tons/year)**

	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>CO2e</b>	<b>Total HAP</b>	<b>Worst Single HAP</b>
Mixing and Blending for Line E6	0.09	0.09	0.09	-	-	-	-	-	-	-
Extruder #6 (Line E6)	0.04	0.04	0.04	-	-	1.72	-	-	1.72	1.72 Methanol
<b>Total</b>	<b>0.13</b>	<b>0.13</b>	<b>0.13</b>	<b>0.00</b>	<b>0.00</b>	<b>1.72</b>	<b>0.00</b>	<b>0</b>	<b>1.72</b>	<b>1.72 Methanol</b>

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
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**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

**PM Emissions from Cast Line Mixing Operations**

Source description	Solids addition rate			PM loss factor wt. pct.	Uncontrolled PTE		PM control pct.	Controlled PTE	
	lbs/mixer-batch	lbs/hr	lbs/yr		lb/batch	tpy		lb/batch	tpy
Extruder #6 (Line E6)	1,800	200	1,752,000	0.01	0.18	0.09	99	0.002	0.001
Film Cast Line L7	1,800	230	2,014,800	0.01	0.18	0.10	99	0.002	0.001
Film Cast Line L8	1,800	230	2,014,800	0.01	0.18	0.10	99	0.002	0.001
Film Cast Line L9	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L10	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L11	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L12	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L13	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L14	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L15	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L16	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L17	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L18	3,000	370	3,241,200	0.01	0.30	0.16	99	0.003	0.002
Film Cast Line L19	3,000	440	3,854,400	0.01	0.30	0.19	99	0.003	0.002
Semi-Works Line	1,000	110	963,600	0.01	0.10	0.05	99	0.001	0.000
					<b>3.94</b>	<b>2.15</b>		<b>0.04</b>	<b>0.02</b>

**Notes:**

- The solids addition rate in 'lbs/hr' is based on the maximum line speed of the film cast. The annual resin usage rate is based on the maximum hourly usage times 8,760 hrs/yr and represents potential annual usage.
- PM loss factor of 0.01 percent of dry material added (0.2 lb/ton) to the closed mixing tank based on engineering estimate.
- PM control efficiency of 99 percent is a conservative estimate for high-efficiency filters that are used with the mixing vessel(s).
- Excluding Line L7, all releases from the the mixing tanks on Lines L8-L19 and the Semi-Works line are into the interior of the manufacturing building.
- PM = PM10 = PM2.5
- Previously, the calculations stated that the control was integral. Integral determinations are done on an individual basis. No integral determinations were ever completed for the filters. It was a typo that has been corrected.

**Appendix A: Emissions Calculations****Blown PVOH Extrusion****Company Name:** MonoSol LLC**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350**Part 70 Renewal:** T091-36396-00138**Minor Source Modification:** T091-36824-00138**Significant Permit Modification:** T091-36873-00138**Reviewer:** Brandon Miller

<b>PVOH free methanol content</b>	
Maximum:	4%
Annual Average:	1.25%

	PM (g/hr)	Total VOC (g/hr)
Testing results <sup>1</sup> :	2.9	19.3

	PM	Total VOC
Emission Factor (lb/hr) 1.25%:	0.0096	0.12
Emission Factor (lb/hr) 4%:	0.0096	0.39

<b>PTE</b>					
	PM (lb/hr)	PM (ton/year)	Total VOC (lb/hr)	Total VOC (ton/year) 4%	Total VOC (ton/year) 1.25% (limited)
<b>Line E6</b>	0.01	0.04	0.39	1.72	0.54

**Methodology:**

The PVOH free methanol content has a maximum content of 4%.

MonoSol proposes having a rolling average limit of 1.25%.

<sup>1</sup> The emission testing results were from a May 2015 identical blown film extrusion line located in Worcestershire, England using 0.65 % free methanol content.

Emission Factor (lb/hr) PM = PM (g/hr) test results \* (1 lb / 453.5924 g) \* 150% safety factor

Emission Factor (lb/hr) Total VOC = VOC (g/hr) test results \* (1 lb / 453.5924 g) \* 150% safety factor \* (PVOH free methanol content / 0.65% free methanol content)

PTE (ton/year) = Emission factor (lb/hr) \* (8,760 hr / 1 year) \* (1 ton / 2,000 lb)

**Appendix A: Emissions Calculations**  
**Film Cast Lines Process Emissions & Drying Process Emissions**

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138  
**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

**PVOH Resin VOC (MeOH) content**                    **3.00%**  
**Limited PVOH Resin VOC (MeOH) conte**       **1.25%**

Unit ID	PVOH Resin Usage		Unlimited VOC Emissions		Unlimited Methanol Emissions		Limited VOC Emissions		Limited Methanol Emissions	
	lb/hr	lb/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
L7	230	2014800	6.90	30.22	6.90	30.22	6.90	12.59	6.90	12.59
L8	230	2014800	6.90	30.22	6.90	30.22	6.90	12.59	6.90	12.59
L9	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L10	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L11	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L12	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L13	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L14	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L15	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L16	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L17	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L18	370	3241200	11.10	48.62	11.10	48.62	11.10	20.26	11.10	20.26
L19	440	3854400	13.20	57.82	13.20	57.82	13.20	24.09	13.20	24.09
Semi-Works	110	963600	3.30	14.45	3.30	14.45	3.30	6.02	3.30	6.02
<b>Total</b>			<b>141.30</b>	<b>618.89</b>	<b>141.30</b>	<b>618.89</b>	<b>141.30</b>	<b>257.87</b>	<b>141.30</b>	<b>257.87</b>

VOC emissions result from the drying of the PVOH film solution and volatilization of the free methanol contained in the solution.

**METHODOLOGY**

PTE of VOC/Methanol (lb/hr) = PVOH Resin Usage (lb/hr) x PVOH Resin MeOH content (%)

Unlimited PTE of VOC/Methanol (ton/yr) = PVOH Resin Usage (lb/hr) x PVOH Resin MeOH content (%) x 8760 (hr/yr) x 1 ton/2000 pounds

Limited PTE of VOC/Mehtanol (ton/yr) = PVOH Resin Usage (lb/hr) x Limited PVOH Resin MeOH content (%) x 8760 (hr/yr) x 1 ton/2000 pounds

Note: The limited pound per hour value can be as high as 3% methanol content per hour. The yearly value has to average out to 1.25% annually.

Therefore, the limited VOC emissions lb/hr are multiplied by 3% whereas the yearly values are multiplied by 1.25% for the MeOH content.

**Appendix A: Emissions Calculations  
Weigh Hoppers L7 and Semi-Works Line**

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138

**Significant Permit Modification:** T091-36873-00138

**Reviewer:** Brandon Miller

Line Name	Maximum Throughput (lbs/hr)
Line L7	8,000
Semi-Works	6,000
Total	14,000

Maximum Throughput, Per Hopper (lb/hr)	Total PM Emission Factor (lb/1000 lb)	Total PM Emission Factor (lb/ton)	Control Efficiency
14,000	0.0035	0.007	99%

Total Controlled PM Emissions (lb/hr)	Total Controlled PM Emissions (tons/yr)	Total Uncontrolled PM Emissions (lb/hr)	Total Uncontrolled PM Emissions (tons/yr)
0.049	0.21	4.90	<b>21.46</b>

**Methodology:**

Assume all PM and PM<sub>2.5</sub> emissions are equal to PM<sub>10</sub>.

Control = Fabric filters with 99 % efficiency

Emission Factor (lb/ton) = Emission Factor (lb/1000 lb) / 1000 x 2000 (lb/ton)

Emission factor is from AP-42, Chapter 11.26 (Talc Processing), Table 11.26-1 SCC 3-05-089-85 (November, 1995).

Semi-Works Line weigh hopper is new.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Film Cast Line Drying Ovens**

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138  
**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

As modified in SSM 091-34431-00138

Unit ID	Heat Input Capacity	Heating Value	Potential Throughput	
	MMBtu/hr	MMBtu	MMCF/yr	
L7	4.40	1020	37.8	
L8	4.40		37.8	
L9	6.84		58.7	
L10	6.84		58.7	
L11	6.84		58.7	
L12	7.42		63.7	
L13	7.42		63.7	
L14	7.42		63.7	
L15	8.84		75.9	
L16	8.84		75.9	
L17	8.84		75.9	
L18	8.84		75.9	
L19	29.00		249.1	
Semi-Works	8.69		74.6	
<b>Total</b>	<b>124.6</b>		<b>Total</b>	<b>1,070.4</b>

<sup>1</sup> L9, L10, and L11 each have 6.0 MMBtu/hr of existing oven drying capacity. Each line is adding on 0.84 MMBtu/hr. The next page accounts for the new drying capabilities of L9 through L11.

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	1.0	4.1	4.1	0.3	53.5	2.9	45.0

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.124E-03	6.422E-04	0.04	0.96	1.820E-03	1.01

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.676E-04	5.887E-04	7.492E-04	2.034E-04	1.124E-03	2.933E-03
					<b>Total HAPs</b>	<b>1.01</b>
					<b>Worst HAP</b>	<b>0.96</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	64,221	1	1
Summed Potential Emissions in tons/yr	64,224		
CO2e Total in tons/yr	64,603		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emissions Calculations  
Cooling Towers 1, 2, 3 and 4**

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138  
**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

Cooling Tower ID	Circulating Flow Rate (gal/min)
1	405
2	810
3	1,620
4	1,620
<b>Total</b>	<b>4,455</b>

**Emission Unit:** Non-Contact Water Cooling Tower  
**Source description:** Potential emissions due to release of dissolved solids in total drift from water recirculation stream.

**OPERATION/PRODUCTION RELATED INFORMATION PER COOLING TOWER**

<i>Parameters (Cooling Towers 1-4)</i>	<i>value</i>	<i>units</i>	<i>Reference</i>
Type of cooling tower	Counter-current, blow-through		
Total circulating flow rate	4,455	gal/min	equipment design specification
	267,300	gal/hr	
Cooling tower drift (pct of recirculation flow)	0.001	percent	worse case - vendor claims zero drift
Total cooling tower drift	2.67	gal/hr	calculated value
	22.3	lbs/hr	calc value (density = 8.345 lbs/gal)

**EMISSION RELATED INFORMATION AND CALCULATION METHODOLOGY**

*PM/PM<sub>10</sub> emissions calculated based on the total dissolved solids (TDS) content of recirculating water and resulting drift.  
Calculation method taken from AP-42, Section 13.4.*

<i>Pollutant</i>	<i>value</i>	<i>units</i>	<i>Reference</i>
TDS content of water used in cooling tower	1,800	ppm	max TDS expected from water source after being concentrated at 5 cycles

**PTE for Cooling Towers 1-3**

<b>Pollutant</b>	<b>Total Potential Emissions</b>	
	<b>lbs/hr</b>	<b>tons/year</b>
PM = PM <sub>10</sub> = PM <sub>2.5</sub>	0.040	0.176

= 267,300 gal/hr water flow x 0.001 gal drift/100 gal recirculated; = 2.67 gal/hr water drift x 8.345 lbs/gal water; = 22.3 lbs/hr water drift  
= 22.3 lbs/hr water drift x 1,800 lbs TDS per 1,000,000 lbs water; = 0.040 lb/hr PM/PM10 (TDS in water represents the PM/PM10)

Alternatively --

= 2.67 gal/hr water drift x 3.785 L/gal x 1,800 mg/L TDS x 1 lb/454,000 mg = 0.040 lb/hr PM/PM10

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**Boilers 1 - 5**

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138  
**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

Boiler Number	Heat Input Capacity	HHV	Boiler Number	MMCF/yr	
	MMBtu/hr	$\frac{\text{mmBtu}}{\text{mmscf}}$			
1	8.30		1020	1	71.28
2	8.30			2	71.28
3	8.30			3	71.28
4	8.30			4	71.28
5	12.40			5	106.49
	45.60				391.62

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.4	1.5	1.5	0.1	19.6	1.1	16.4

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	4.112E-04	2.350E-04	1.469E-02	3.525E-01	6.658E-04	3.685E-01

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	9.791E-05	2.154E-04	2.741E-04	7.441E-05	4.112E-04	1.073E-03
						<b>Total HAPs</b>
						<b>3.695E-01</b>
						<b>Worst HAP</b>
						<b>3.525E-01</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	23,497	0	0
Summed Potential Emissions in tons/yr	23,498		
CO2e Total in tons/yr	23,637		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emission Calculations  
Tank VOC Emissions - Maximum PTE**

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138  
**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

Tank Number	Product Stored	Losses (Pounds per Year)		Total VOC Lbs/yr
		Working	Breathing	
1	Glycerine	0.02	0.01	0.03
2	Glycerine	0.02	0.01	0.03
3	Glycerine	0.02	0.01	0.03
4	Glycerine	0.02	0.01	0.03
5	Glycerine	0.0342	0.0034	0.0376
6	Glycerine	0.0342	0.0034	0.0376
7	Glycerine	0.0342	0.0034	0.0376
8	Glycerine	0.0342	0.0034	0.0376
9	Glycerine	0.03	0.01	0.04
10	Glycerine	0.03	0.01	0.04
11	Glycerine	0.03	0.01	0.04
12	Glycerine	0.03	0.01	0.04
<b>Total VOC lbs/yr</b>		<b>0.34</b>	<b>0.09</b>	<b>0.43</b>
			<b>Tons/yr:</b>	<b>2.15E-04</b>

Note: All storage tank emissions estimated using EPA's TANKS 4.0.9d software program.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**Modified Insignificant Heaters**

**Company Name:** MonoSol LLC  
**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350  
**Part 70 Renewal:** T091-36396-00138  
**Minor Source Modification:** T091-36824-00138  
**Significant Permit Modification:** T091-36873-00138  
**Reviewer:** Brandon Miller

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
55.3	1020	474.9

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.45	1.80	1.80	0.14	23.75	1.31	19.95

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

	HAPs - Organics					
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics
Emission Factor in lb/MMcf						
Potential Emission in tons/yr	4.987E-04	2.850E-04	1.781E-02	4.274E-01	8.074E-04	<b>4.468E-01</b>

	HAPs - Metals					
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals
Emission Factor in lb/MMcf						
Potential Emission in tons/yr	1.187E-04	2.612E-04	3.325E-04	9.024E-05	4.987E-04	<b>1.301E-03</b>
					<b>Total HAPs</b>	<b>4.481E-01</b>
					<b>Worst HAP</b>	<b>4.274E-01</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	28,496	1	1
Summed Potential Emissions in tons/yr	28,497		
CO2e Total in tons/yr	28,665		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emissions Calculations**  
**List of Insignificant Heaters**

**Company Name:** MonoSol LLC

**Address City IN Zip:** 1609 Genesis Drive, La Porte, IN 46350

**Part 70 Renewal:** T091-36396-00138

**Minor Source Modification:** T091-36824-00138

**Significant Permit Modification:** T091-36873-00138

**Reviewer:** Brandon Miller

**Existing Equipment (Btu/hr)**

**Suspended heating units Building A**

SHU 1	100,000
SHU 2	100,000
SHU 3	250,000
SHU 4	100,000
SHU 5	100,000
SHU 6	100,000
SHU 7	100,000
SHU 8	100,000
SHU 9	225,000
SHU 10	225,000
SHU 11	100,000
SHU 12	100,000
SHU 13	100,000
SHU 14	100,000
SHU 15	100,000
SHU 16	225,000
SHU 17	100,000
<b>Subtotal</b>	<b>2,225,000</b>

**Roof top units Building A**

RTU 1	270,000
RTU 2	270,000
RTU 3	270,000
RTU 4 (elec)	0
RTU 5	180,000
RTU 6	180,000
RTU 7	156,000
RTU 8	156,000
RTU 9	128,000
RTU 10	128,000
<b>Subtotal</b>	<b>1,738,000</b>

**Air makeup units Building A**

AMU 1	4,961,000
AMU 2	1,114,000
AMU 3	1,114,000
AMU 4	4,538,000
AMU 5	2,228,000
AMU 6	6,600,000
AMU 7	1,114,000
<b>Subtotal</b>	<b>21,669,000</b>

**Suspended Heating units Building B**

SHU 101	100,000
SHU 102	45,000
SHU 103	45,000
SHU 104	145,000
SHU 105	145,000
SHU 106	145,000
SHU 107	145,000
<b>Subtotal</b>	<b>770,000</b>

**Roof top units Building B:**

RTU 101	180,000
RTU 102	210,000
RTU 103	270,000
RTU 104	384,000
RTU 105	270,000
RTU 106	270,000
RTU 107	270,000
<b>Subtotal</b>	<b>1,854,000</b>

**Air makeup units Building B**

AMU 101	1,114,000
AMU 102	4,538,000
<b>Subtotal</b>	<b>5,652,000</b>

**Warehouse air handlers Building A**

AHU 1	580,000
AHU 2	580,000
<b>Subtotal</b>	<b>1,160,000</b>

**Warehouse air handlers Building B**

AHU101	580,000
--------	---------

**Existing Subtotal**      **35,648,000**

**New Equipment in Building B (Btu/hr)**

AC L16	384,000
AC L17/Pilot	384,000
AC L18/19	384,000
AMU L16	4,000,000
AMU L17	4,000,000
AMU L18	4,000,000
AMU L19	4,000,000
AMU Pilot	2,500,000
<b>Subtotal</b>	<b>19,652,000</b>



# Indiana Department of Environmental Management

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100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

March 31, 2016

Ms. Melanie Kroczek  
MonoSol, LLC  
1609 Genesis Drive  
LaPorte, IN 46350

Re: Public Notice  
MonoSol, LLC  
Permit Level: Title V Significant Permit Modification  
Permit Number: 091-36873-00138

Dear Ms. Kroczek:

Enclosed is a copy of your draft Title V Significant Permit Modification, 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 LaPorte Herald - Argus in LaPorte, Indiana publish the abbreviated version of the public notice no later than April 4, 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 LaPorte County Public Library, 904 Indiana Avenue in LaPorte, 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 Brandon Miller, 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 4-5374 or dial (317) 234-5374.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

March 30, 2016

LaPorte Herald - Argus  
701 State Street  
LaPorte, IN 46350

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for MonoSol, LLC, LaPorte 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 April 4, 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 Significant Permit Modification  
Permit Number: 091-36873-00138

Enclosure

PN Newspaper.dot 2/17/2016



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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

March 31, 2016

To: LaPorte County Public Library

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: MonoSol, LLC**  
**Permit Number: 091-36873-00138**

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 2/17/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**March 31, 2016**  
**MonoSol, LLC**  
**091-36873-00138**

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](mailto: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



# Indiana Department of Environmental Management

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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

## **AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT**

March 31, 2016

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

**Permit Number: 091-36873-00138**  
**Applicant Name: MonoSol, LLC**  
**Location: LaPorte, LaPorte 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](mailto:chammack@idem.IN.gov) or (317) 233-2414.

Affected States Notification.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	VHAUN 3/31/2016 MonoSol, LLC 091-36873-00138 DRAFT		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	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		Melanie C Kroczek MonoSol, LLC 1609 Genesis Dr LaPorte IN 46350 (Source CAATS)										
2		Tim Boyle VP Director of Global Operations MonoSol, LLC 1609 Genesis Dr LaPorte IN 46350 (RO CAATS)										
3		LaPorte Co Public Library - LaPorte Branch 904 Indiana Ave. LaPorte IN 46350-4307 (Library)										
4		LaPorte City Council/ Mayors Ofc. 801 Michigan Avenue LaPorte IN 46350 (Local Official)										
5		LaPorte County Commissioners 555 Michigan Avenue # 202 LaPorte IN 46350 (Local Official)										
6		Mr. Dennis Hahney Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 (Affected Party)										
7		LaPorte County Health Department County Complex, 4th Floor, 809 State St. LaPorte IN 46350-3329 (Health Department)										
8		Mr. Dick Paulen Barnes & Thornburg 121 W Franklin Street Elkhart IN 46216 (Affected Party)										
9		Jeff Slayback TRC Environmental Corporation 11231 Cornell Park Drive Cincinnati OH 45242 (Consultant)										
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
9			