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

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Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Signficant Modification to a
Part 70 Operating Permit
for Eckart America Corporation in Lake County

Significant Source Modification No.: 089-37086-00565
Significant Permit Modification No.: 089-37100-00565

The Indiana Department of Environmental Management (IDEM) has received an application from Eckart America Corporation, located at 650 West 67th Avenue, Schererville, IN 46375, for a significant modification of its Part 70 Operating Permit issued on December 14, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Eckart America Corporation to make certain changes at its existing source. Eckart America Corporation has submitted an application related to the addition of a printing press, mixers, tanks, lacquer production operation, and a water-based ink production area that were previously owned by CCL Design (Source ID 089-00062).

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:

Dyer-Schererville Branch of the Lake County Public Library
1001 W Lincoln Highway
Schererville, IN 46240

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 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing,

you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 089-37086-00565 and SPM 089-37100-00565 in all correspondence.

Comments should be sent to:

Madhurima Moulik
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-0868
Or dial directly: (317) 233-0868
Fax: (317) 232-6749 attn: Madhurima Moulik
E-mail: mmoulik@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Madhurima Moulik of my staff at the above address.

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

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DRAFT

Mr. Sean Adley
Eckart America Corporation
650 West 67th Avenue, Suite 200
Schererville, IN 46375

Re: 089-37086-00565
Significant Source Modification

Dear Mr. Adley:

Eckart America Corporation was issued Part 70 Operating Permit No. T089-32114-00565 on December 14, 2012 for a stationary commercial rotogravure printing and pigment manufacturing operation located at 650 West 67th Avenue, Suite 200, Schererville, IN 46375. An application to modify the source was received on April 15, 2016. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) packaging rotogravure printing press, identified as C-8, installed in 1985, re-permitted in 2016, with a maximum line speed of 250 feet per minute, a maximum coating rate of 0.0318 g/cm2, and a maximum printing width of 64.0 inches, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8.

Under 40 CFR 63, Subpart KK, C-8 is considered an existing affected source.

(b) Eight (8) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

(c) One (1) lacquer production area, re-permitted in 2016, with a maximum capacity of 115,632 tons of product produced per year, consisting of the following equipment:

(1) One (1) Schold mixer, installed in 1993, identified as 718, with no controls, with a maximum capacity of thirty (30) horsepower.

(2) Two (2) Schold mixers, both installed in 1993, identified as 713 and 714, with no controls, each with maximum capacity of thirty (30) horsepower.

(3) One (1) Schold Mixer, installed in 1993, identified as 717, with no controls, with a maximum capacity of thirty (30) horsepower.

(4) One (1) 1400 gallon R-Coat Tank.

(5) Three (3) 2300 gallon Intermediate Tanks.

(6) Three (3) 1170 gallon Intermediate Tanks.

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Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

(d) Insignificant Activities:

One (1) water-based ink production area, with a maximum capacity of 241.1 tons of material mixed per year, consisting of the following equipment:

(1) Two (2) Mounted Drum Mixers, with no controls, with a maximum capacity of five (5) horsepower, each.

(2) Eight (8) bench top air-driven mixers, with no controls.

(e) Insignificant Activities:

(1) One (1) IKA T25 Ultra Turrax Mixer, with a maximum capacity of two-thirds (2/3) HP.

(2) Two (2) IKA T50 Ultra Turrax Mixers, with a maximum capacity of one (1) HP

(3) Silverson L4RT-A Mixer, with a maximum capacity of one-third (1/3) HP.

(4) Dispermat CV Mixer, with a maximum capacity of two-thirds (2/3) HP.

(5) Two (2) Air Mixers, with a maximum capacity of two (2) HP each.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

DRAFT

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

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

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

If you have any questions on this matter, please contact Madhurima Moulik of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Madhurima Moulik or extension 3-0868 or dial (317) 233-0868.

Sincerely,

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

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

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Commissioner

Significant Source Modification to a Part 70 Source
DRAFT
OFFICE OF AIR QUALITY

Eckart America Corporation
650 West 67th Avenue Suite 200
Schererville, Indiana 46375

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

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.
This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

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Issued by: Jason R. Krawczyk Section Chief, Permits Branch Office of Air Quality	Issuance Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary commercial rotogravure printing and pigment manufacturing operation.

Source Address:	650 West 67th Avenue Suite 200, Schererville, Indiana 46375
General Source Phone Number:	219-864-4872
SIC Code:	2754 (Commercial Printing, Gravure), 2816 (Inorganic Pigments), 2851 (Paints, Varnishes, Lacquers, Enamels, and Allied Products)
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-7]

This stationary commercial rotogravure printing and pigment and lacquer manufacturing site consists of two (2) separate sources:

(1) Source 1 (Eckart America) located at 650 West 67th Avenue, Suite 200, Schererville, Indiana 46375; and

(2) Source 2 (Actega North America) is located at 650 West 67th Avenue, Suite 200, Schererville, Indiana 46375.

These plants are located on the same property, have the same two-digit SIC code, and are owned and controlled by the same parent company. Eckart America and Actega North American are considered part of the same major source.

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

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

(a) One (1) three-station coater packaging rotogravure printing press, identified as C-9, constructed in 2001, with a maximum line speed of 1500 feet per minute, a maximum coating rate of 0.000693 g/cm2, and a maximum printing width of 72.8 inches, with emissions controlled by one (1) 4.0 MMBtu/hr thermal oxidizer, which includes a 4.0 MMBtu/hr natural gas-fired hot oil system, exhausting to one (1) stack C-9.

Under 40 CFR 63, Subpart KK, this is considered as an existing affected source.

(b) One (1) pigment production area, approved in 2016 for modification, with a maximum capacity of 350.4 tons of product per year, consisting of the following equipment:

(1) One (1) Hockmeyer mixer with one (1) homogenizer, identified as PP-2, constructed in 2005, with no controls, with maximum capacity of fifty (50) horsepower.

(2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in 2007, with no controls, with maximum capacity of fifty (50) horsepower.

(3) One (1) Schold Mixer, identified as 701, constructed in 1974, with no controls, with a maximum capacity of thirty (30) horsepower.

(4) Five (5) stripper tubs, two (2) dirty acetone tanks, five (5) product tanks, and two (2) sludge tanks, three (3) reclaim acetone tanks, and two (2) acetone distillation units.

(5) One (1) totally enclosed Ross Mixer with one (1) condenser, identified as PP-4, constructed in 2014, with a maximum capacity of 9.5 horsepower.

(6) One (1) SWECO screener, with a maximum capacity of 0.5 horsepower.

(c) Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

(d) One (1) packaging rotogravure printing press, identified as C-8, installed in 1985, re-permitted in 2016, with a maximum line speed of 250 feet per minute, a maximum coating rate of 0.0318 g/cm2, and a maximum printing width of 64.0 inches, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8.

Under 40 CFR 63, Subpart KK, C-8 is considered an existing affected source.

(e) One (1) lacquer production area, re-permitted in 2016, with a maximum capacity of 115,632 tons of product produced per year, consisting of the following equipment:

(1) One (1) Schold mixer, installed in 1993, identified as 718, with no controls, with a maximum capacity of thirty (30) horsepower.

(2) Two (2) Schold mixers, both installed in 1993, identified as 713 and 714, with no controls, each with maximum capacity of thirty (30) horsepower.

(3) One (1) Schold Mixer, installed in 1993, identified as 717, with no controls, with a maximum capacity of thirty (30) horsepower.

(4) One (1) 1400 gallon R-Coat Tank.

(5) Three (3) 2300 gallon Intermediate Tanks.

(6) Three (3) 1170 gallon Intermediate Tanks.

A.4 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) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr:

(1) Three (3) natural gas-fired boilers, each constructed in 2008, identified as F, G, and H, and each with a maximum heat input capacity of 1.7 MMBtu/hr.

(b) Paved roads and parking lots.

(c) Other emission units, not regulated by a NESHAP, with PM10 and SO2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including:

(1) One (1) 50 gallon parts washer.

(2) One (1) R& D Spray Booth with a maximum capacity of ten (10) parts per day.

(3) One (1) IKA T25 Ultra Turrax Mixer, with a maximum capacity of two-thirds (2/3) HP.

(4) Two (2) IKA T50 Ultra Turrax Mixers, with a maximum capacity of one (1) HP

(5) Silverson L4RT-A Mixer, with a maximum capacity of one-third (1/3) HP.

(6) Dispermat CV Mixer, with a maximum capacity of two-thirds (2/3) HP.

(7) Two (2) Air Mixers, with a maximum capacity of two (2) HP each.

(d) One (1) water-based ink production area, with a maximum capacity of 241.1 tons of material mixed per year, consisting of the following equipment:

(1) Two (2) Mounted Drum Mixers, with no controls, with a maximum capacity of five (5) horsepower, each.

(2) Eight (8) bench top air-driven mixers, with no controls.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

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

(a) This permit, T089-32114-00565, 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.4 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.5 Enforceability [326 IAC 2-7-7][IC 13-17-12]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

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

B.9 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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

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

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

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

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

B.10 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, 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.

(b) 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).

(c) 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.12 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

B.14 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 T089-32114-00565 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.15 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.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or

anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

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

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

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

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

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

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

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

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

B.18 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.19 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.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 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.23 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.24 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

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

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

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

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

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

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

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

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

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

Indianapolis, Indiana 46204-2251

no later than 180 days from the date on which this source commences operation.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

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

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

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

(I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

(II)

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

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

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

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

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

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

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

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

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

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

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

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:

(1) starting in 2004 and every three (3) years thereafter, and

(2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

(b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

C.16 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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

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

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

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

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

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

(b) The address for report submittal is:

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

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

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) three-station coater packaging rotogravure printing press, identified as C-9, constructed in 2001, with a maximum line speed of 1500 feet per minute, a maximum coating rate of 0.000693 g/cm2, and a maximum printing width of 72.8 inches, with emissions controlled by one (1) 4.0 MMBtu/hr thermal oxidizer, which includes a 4.0 MMBtu/hr natural gas-fired hot oil system, exhausting to one (1) stack C-9.

Under 40 CFR 63, Subpart KK, this is considered as an existing affected source.

(b) One (1) pigment production area, approved in 2016 for modification, with a maximum capacity of 350.4 tons of product produced per year, consisting of the following equipment:

(1) One (1) Hockmeyer mixer with one (1) homogenizer, identified as PP-2, constructed in 2005, with maximum capacity of fifty (50) horsepower.

(2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in 2007, with maximum capacity of fifty (50) horsepower.

(3) One (1) Schold Mixer, identified as 701, constructed in 1974, constructed in 1993 with no controls, with a maximum capacity of thirty (30) horsepower.

(4) Five (5) stripper tubs, two (2) dirty acetone tanks, five (5) product tanks, two (2) sludge tanks, three (3) reclaim acetone tanks, and two (2) acetone distillation units.

(5) One (1) totally enclosed Ross Mixer with one (1) condenser, identified as PP-4, constructed in 2014, with a maximum capacity of 9.5 horsepower.

(6) One (1) SWECO screener, with a maximum capacity of 0.5 horsepower.

(d) One (1) packaging rotogravure printing press, identified as C-8, installed in 1985, re-permitted in 2016, with a maximum line speed of 250 feet per minute, a maximum coating rate of 0.0318 g/cm2, and a maximum printing width of 64.0 inches, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8.

Under 40 CFR 63, Subpart KK, C-8 is considered an existing affected source.

(e) One (1) lacquer production area, permitted in 2016, with a maximum capacity of 115,632 tons of product produced per year, consisting of the following equipment:

(1) One (1) Schold mixer, installed in 1993, identified as 718, with no controls, with a maximum capacity of thirty (30) horsepower.

(2) Two (2) Schold mixers, both installed in 1993, identified as 713 and 714, with no controls, each with maximum capacity of thirty (30) horsepower.

(3) One (1) Schold Mixer, installed in 1993, identified as 717, with no controls, with a maximum capacity of thirty (30) horsepower.

(4) One (1) 1400 gallon R-Coat Tank.

(5) Three (3) 2300 gallon Intermediate Tanks.

(6) Three (3) 1170 gallon Intermediate Tanks.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

(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 Emission Offset Minor Limits [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 (Emission offset) not applicable, the Permittee shall comply with the following:

(a) The emissions of VOC from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 96.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the Permittee shall comply with the following:

(a) The VOC emissions from each mixer (PP-2, PP-1, 701, and PP-4) at the pigment production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The VOC emissions from each mixer (718, 713, 714, and 717) at the lacquer production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits will render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to the mixers PP-2, PP-1, 701, PP-4, 718, 713, 714, and 717.

D.1.3 Hazardous Air Pollutants [326 IAC 2-4.1]

In order to render the requirements of 326 IC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and render the source minor under Section 112 of the Clean Air Act, the Permittee shall comply with the following:

(a) The emissions of a single HAP (MIBK) from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 9.9 tons per year; and

(b) The emissions of total HAPs from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 23.5 tons per year.

Compliance with these limits, combined with the potential to emit of any single HAP and the potential to emit of all total combined HAPs from all other emission units at this source, shall limit the source-wide potential to emit of any single HAP (MIBK) to less than ten (10) tons per twelve (12) consecutive month period, and the potential to emit of combined HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and will render the source minor under Section 112 of the Clean Air Act.

D.1.4 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 8-5-5(e), the Permittee shall:

(a) Not cause, allow, or permit the operation of the presses (C-8 and C-9) unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) Use a capture system in conjunction with each emission control system. The capture system shall attain efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.1.6 VOC Control

In order to assure compliance with Condition D.1.2(a), the two (2) condensers shall operate at all times that the Myers mixer is operated. The condensers shall be operated and maintained according to the manufacturer's specifications.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

Compliance with the VOC emissions limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by maintaining records of usage and maintaining product formulation data for all coatings manufactured in the pigment production facility. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Testing Requirements [326 IAC 2-1.1-11]

In order to determine compliance with Conditions D.1.1, D.1.3 and D.1.4, the Permittee shall conduct a compliance test to verify the overall VOC and HAP control efficiency (capture and destruction efficiency) for the thermal oxidizers for presses C-8 and C-9, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every two and a half (2.5) years from the date of the most recent compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

D.1.9 Volatile Organic Compounds (VOC)

In order to assure compliance with Condition D.1.2, the Permittee shall determine the VOC from each mixer at the Pigment Production and Lacquer Production areas according to the following formulas:

(a) Pigment Production VOC emissions (tons/yr) at each mixer =

Inputs (weight Cake + weight VOC + weight partial product) - output (weight packed product) - acetone emissions (starting weight acetone in cake - ending weight acetone left in finished product) - residue - weight VOC condensed

(b) Lacquer Production VOC emissions (tons/yr) at each mixer =

lacquer production rate (tons/yr) x $EF_{lp,VOC}$ /2000

$EF_{lp,VOC}$ = VOC emission factor for lacquer production (lb VOC per ton lacquer produced)

Where $EF_{lp,VOC}$ = 0.64 lb/ton of lacquer produced

D.1.10 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

(a) In order to assure compliance with Condition D.1.1, the Permittee shall determine the VOC emissions from C-8, C-9, Pigment Production, and Lacquer Production according to the following formula:

(1) VOC emissions (tons per year) =

(VOC Input C-8 x (1-CE_{c-8})+ (VOC Input C-9 x (1-CE_{c-9})) + VOC emissions (pigment production) + VOC emissions (lacquer production)

Where:

(2) VOC emissions (pigment production) =

Inputs (weight Cake + weight VOC + weight partial product) - output (weight packed product) - acetone emissions (starting weight acetone in cake - ending weight acetone left in finished product) - residue - weight VOC condensed

VOC emissions (lacquer production) = lacquer production rate (tons/yr) x $EF_{lp,VOC}$ /2000

$EF_{lp,VOC}$ = VOC emission factor for lacquer production (lb VOC per ton lacquer produced)

(b) In order to assure compliance with Condition D.1.2, the Permittee shall determine the HAP emissions from C-8, C-9, Pigment Production, and Lacquer Production according to the following formulas:

(1) Single HAP emissions (tons per year)=

[Single HAP input at C-8 x (1-CE_{c-8})]+ [Single HAP input at C-9 x (1-CE_{c-9})] + single HAP emissions (pigment production) + single HAP emissions (lacquer production)

(2) Total HAP emissions (tons per year) =

[Total HAP input at C-8 x (1-CE_{c-8})]+ [Total HAP input at C-9 x (1-CE_{c-9})] + total HAP emissions (pigment production) + total HAP emissions (lacquer production)

Where:

CE_{c-8} = overall control efficiency of C-8 as determined during the most recent valid performance test

CE_{c-9} = overall control efficiency of C-9, as determined during the most recent valid performance tests.

Where:

HAP emissions (pigment production) =

= ((Inputs (weight Cake + weight solvent + weight partial product) - output (weight packed product) - acetone emissions (starting weight acetone in cake - ending weight acetone left in finished product) - residue - solvent condensed)) x % HAP in solvent

HAP emissions (lacquer production) = lacquer production rate (tons/yr) x $EF_{lp,HAP}$ /2000

$EF_{lp,HAP}$ = HAP emission factor for lacquer production (lb HAP per ton lacquer produced)

D.1.11 VOC Control [326 IAC 8-1-2(a)][326 IAC 8-5-5]

Pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-5-5, and in order to assure compliance with Conditions D.1.1, D.1.3 and D.1.4, the Permittee shall operate the thermal oxidizers controlling emissions from presses C-8 and C-9 at all times the respective press is wetted and VOC materials are being applied.

D.1.12 Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices [326 IAC 8-1-9][326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-1-9:

(1) For the purpose of records required under 326 IAC 8-1-12(c), the applicable test methods and procedures specified in 326 IAC 8-1-4 of this rule shall be used to determine the following:

(A) The volatile organic compound (VOC) content of each coating, as applied.

(B) The efficiency of the capture system and control device.

(2) Records required by this rule or records used to demonstrate that a source is exempt from the requirements of this article shall be submitted to the IDEM, OAQ within thirty (30) days of the receipt of a written request.

(3) All records required by this rule or records necessary to determine compliance with 326 IAC 8-5-5 shall be accessible on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(b) Pursuant to 326 IAC 8-1-12, for facilities using control devices to comply with 326 IAC 8-5-5, the Permittee shall comply with the following requirements:

(1) Control system operation, maintenance, and testing requirements shall be as follows:

(A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written

request of IDEM, OAQ.

(B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

(C) The control system shall be tested according to the following schedule and in the following situations:

(i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(iii) A compliance test shall be performed within ninety (90) days of:

(AA) startup of a new coating facility;

(BB) changing the method of compliance for an existing coating facility from compliant coatings or daily weighted averaging to control devices; or

(CC) receipt of a written request from the IDEM, OAQ.

(D) All compliance tests shall be conducted according to a protocol approved by the IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(i) Test procedures.

(ii) Operating and control system parameters.

(iii) Type of VOC containing process material being used.

(iv) The process and control system parameters that will be monitored during the test.

(2) Monitoring equipment requirements shall be as follows. If a thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate.

(c) Pursuant to 326 IAC 8-1-12, the Permittee shall collect and record each day and maintain all of the following information each day for each coating facility:

(1) The name and identification number of each coating used at each coating facility.

(2) The weight of VOC of each coating used each day at each coating facility.

(3) The required overall emission reduction efficiency for each day for each coating facility.

(4) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by 326 IAC 8-1-12(b)(1)(C).

(5) Control device monitoring data for thermal incinerators as follows:

(A) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.

(B) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(6) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.

(d) Pursuant to 326 IAC 8-1-12, the Permittee shall collect, record, and maintain for each coating facility a maintenance log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

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

D.1.13 Thermal Oxidizer Temperature

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

(b) The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.3 and D.1.4.

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

(d) If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. A 3-hour average temperature reading below the above mentioned 3-hour average temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.14 Thermal Oxidizer Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.3, and D.1.4.

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

(c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.15 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, D.1.2, D.1.3, and D.1.7, the Permittee shall maintain the following records for the presses identified as C-8 and C-9, the Pigment Production Area and the Lacquer Production area, in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emissions limits established in Conditions D.1.1, D.1.2, and D.1.3.

(1) The amount and VOC and HAP content of each ink, coating material, wash, and cleanup solvent used on a monthly basis for presses C-8 and C-9. Records shall include purchase orders, invoices, supplier data sheets, material safety data sheets (MSDS), and pigment and lacquer product formulation data necessary to verify the type and amount used;

(2) The total VOC and HAP usage at C-8 and C-9 for each month;

(3) The weight of VOCs and HAPs emitted at C-8 and C-9 for each compliance period;

(4) The monthly records of the weight of input and products at each mixer at the pigment production area;

(5) The monthly records of the weight of products at each mixer at the lacquer production area;

(6) The monthly records of VOC emissions at each mixer at the pigment production area;

(7) The monthly records of VOC emissions at each mixer at the lacquer production area.

(b) To document the compliance status with Condition D.1.13, the Permittee shall maintain continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(c) To document the compliance status with Condition D.1.14, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizers. The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

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

D.1.16 Reporting Requirements

(a) Pursuant to 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ when any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:

(1) Name and location of the coating facility.

(2) Identification of the control system where the noncompliance occurred and the coating facility it served.

(3) Time, date, and duration of the noncompliance.

(4) Corrective action taken.

(b) Quarterly summaries of the information to document the compliance status with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted using the reporting forms at the end of this permit or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

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

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

D.2.1 Record Keeping Requirements

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), Permittee of a stationary vessel with a capacity of less than thirty-nine thousand (39,000) gallons, and which is not exempt, shall maintain a record and submit to IDEM, OAQ a report containing the following information on the vessel:

(a) The vessel identification number.

(b) The vessel dimensions.

(c) The vessel capacity.

The Permittee shall keep all records as described for the life of the vessel.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr:

(1) Three (3) natural gas-fired boilers, each constructed in 2008, identified as F, G, and H, and each with a maximum heat input capacity of 1.7 MMBtu/hr.

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

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

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions each of the three (3) natural gas-fired boilers, identified as F, G and H, each rated at 1.7 MMBtu per hour heat input capacity, shall not exceed 0.6 pounds per MMBtu.

SECTION E.1 **NESHAP**

Emissions Unit Description:

(a) One (1) three-station coater packaging rotogravure printing press, identified as C-9, constructed in 2001, with a maximum line speed of 1500 feet per minute, a maximum coating rate of 0.000693 g/cm2, and a maximum printing width of 72.8 inches, with emissions controlled by one (1) 4.0 MMBtu/hr thermal oxidizer, which includes a 4.0 MMBtu/hr natural gas-fired heat recovery unit, exhausting to one (1) stack C-9.

Under 40 CFR 63, Subpart KK, this is considered as an existing affected source.

(b) One (1) packaging rotogravure printing press, identified as C-8, installed in 1985, re-permitted in 2016, with a maximum line speed of 250 feet per minute, a maximum coating rate of 0.0318 g/cm2, and a maximum printing width of 64.0 inches, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8.

Under 40 CFR 63, Subpart KK, this is considered an existing affected source.

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

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

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart KK.

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

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

E.1.2 Printing and Publishing NESHAP [40 CFR 63, Subpart KK][326 IAC 20-18]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart KK (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-18-1, for the emission unit(s) listed above:

(1) 40 CFR 63.820(a)(1), (b), (c)
(2) 40 CFR 63.821
(3) 40 CFR 63.822
(4) 40 CFR 63.823
(5) 40 CFR 63.825(a), (b), (d), (h)
(6) 40 CFR 63.826(a)
(7) 40 CFR 63.827(b)(2), (c)(2), (d-f)

(8) 40 CFR 63.828(a)(1-2, 4(i), 5)
(9) 40 CFR 63.829(a-c, e-h)
(10) 40 CFR 63.830
(11) 40 CFR 63, Subpart KK Table 1

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

E.1.3 Testing Requirements [326 IAC 2-1.1-11][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In order to demonstrate compliance with Condition E.1.2, the Permittee shall perform the testing required under 40 CFR 63, Subpart KK, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

SECTION E.2 **NESHAP**

Emissions Unit Description:

(g) Fifteen (15) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

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

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

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

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart EEEE.

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

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

E.2.2 Organic Liquids Distribution (Non-Gasoline) NESHAP [40 CFR 63, Subpart EEEE][326 IAC 20-83]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart EEEE (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-83-1, for the emission unit(s) listed above:

(1) 40 CFR 63.2334(a)
(2) 40 CFR 63.2338(a-c), (f)
(3) 40 CFR 63.2342(b)(1), (d)
(4) 40 CFR 63.2343(a), (d)
(5) 40 CFR 63.2350
(6) 40 CFR 63.2370(c)
(7) 40 CFR 63.2382(a), (b)(1)
(8) 40 CFR 63.2386(a), (b), (c)(1-3), (d)(3)(i), (d)(3)(ii), (d)(4)(i), (e)
(9) 40 CFR 63.2390(a), (d)
(10) 40 CFR 63.2394
(11) 40 CFR 63.2398
(12) 40 CFR 63.2402
(13) 40 CFR 63.2406
(14) 40 CFR 63, Subpart EEEE Table 1

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

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Eckart America Corporation
Source Address: 650 West 67th Avenue Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Eckart America Corporation
Source Address: 650 West 67th Avenue Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565

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

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

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

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Eckart America Corporation
Source Address: 650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565
Facility: Presses C-8 and C-9, Pigment Production, Lacquer Production
Parameter: Volatile Organic Compound (VOC)
Limit: The VOC emissions shall be limited to 96.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: YEAR:

Month	VOC Emissions	VOC Emissions	VOC Emissions
	This Month (Tons)	Previous 11 Months (tons)	12 Month Total (Tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Eckart America Corporation
Source Address: 650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565
Facility: Pigment Production Mixers (PP-2, PP-1, 701, and PP-4)
Parameter: Volatile Organic Compound (VOC)
Limit: The VOC emissions from each mixer (PP-2, PP-1, 701, and PP-4) at the pigment production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: YEAR:

Month	Pigment Production Mixer ID	Total VOC Emissions	Total VOC Emissions	Total VOC Emissions
		This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
	PP-2			
	PP-1			
	701			
	PP-4			
	PP-2			
	PP-1			
	701			
	PP-4			
	PP-2			
	PP-1			
	701			
	PP-4			

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Eckart America Corporation
Source Address: 650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565
Facility: Lacquer Production Mixers (718, 713, 714, and 717)
Parameter: Volatile Organic Compound (VOC)
Limit: The VOC emissions from each mixer (718, 713, 714, and 717) at the lacquer production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: YEAR:

Month	Lacquer Production Mixer ID	Total VOC Emissions	Total VOC Emissions	Total VOC Emissions
		This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
	718			
	713			
	714			
	717			
	718			
	713			
	714			
	717			
	718			
	713			
	714			
	717			

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Eckart America Corporation
Source Address: 650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565
Facility: Presses C-8 and C-9, Pigment Production, Lacquer Production
Parameter: Single Hazardous Air Pollutant (HAP) Emissions (MIBK)
Limit: Less than 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: YEAR:

Month	Single HAP Emissions	Single HAP Emissions	Single HAP Emissions
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Eckart America Corporation
Source Address: 650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565
Facility: Presses C-8 and C-9, Pigment Production, Lacquer Production
Parameter: Total Hazardous Air Pollutants (HAP)
Limit: Less than 23.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: YEAR:

Month	Total HAP Emissions	Total HAP Emissions	Total HAP Emissions
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Source Name: Eckart America Corporation
Source Address: 650 West 67th Avenue Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565

Months: _____ to _____ Year: _____

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Eckart America Corporation
Source Location:	650 West 67th Avenue, Suite 200, Schererville, IN 46375
County:	Lake
SIC Code:	2754 (Commercial Printing, Gravure), 2816 (Inorganic Pigments), 2851 (Paints, Varnishes, Lacquers, Enamels, and Allied Products)
Operation Permit No.:	T089-32114-00565
Operation Permit Issuance Date:	December 14, 2012
Significant Source Modification No.:	089-37086-00565
Significant Permit Modification No.:	089-37100-00565
Permit Reviewer:	Katrina Gilbank/Madhurima Moulik

Source Definition

Eckart America and Actega North America are both located at 650 West 67th Avenue, Suite 200, Schererville, IN 46375. Eckart America is a commercial rotogravure printing and pigment manufacturing operation. Actega North America is a lacquer and water-based ink production facility. Eckart America leases space within the facility building to Actega North America. Additionally, both Eckart and Actega are taking over equipment previously owned by CCL Design; CCL Design is leaving this facility and selling equipment to Eckart and Actega. Eckart and Actega are owned by the same parent company and operate within the same building.

IDEM, OAQ has examined whether the emission activities at these different facilities are part of the same major source. The term “major source” is defined at 326 IAC 2-7-1(22). In order for the facilities to be considered one major source, they must meet all three of the following criteria:

(1) the facilities must be under common ownership or common control;

(2) the facilities must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

(3) the facilities must be located on the same, contiguous or adjacent properties.

Eckart America and Actega North America are owned and controlled by the same parent company. Therefore, condition one is met.

The Standard Industrial Classification Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The SIC Code is determined by looking at the principal product or activity of each facility. Eckart America's primary activity with the greatest economic value is pigment production, falling under SIC Code 28. Actega North America's primary activity with the greatest economic value is water-based ink production, falling under the two-digit SIC Code 28. Since Eckart and Actega operate under the same two-digit SIC Code, 28, condition two is met. It is therefore not necessary to determine whether either facility is qualified as a support facility.

The last criterion of the definition is whether the facilities are on the same, contiguous or adjacent properties. The facilities are located within the same building on the same property. Therefore, condition three is met.

Because Eckart America and Actega North America are owned by the same company, have the same two-digit SIC Code, and are located on the same property, all three criteria are met, and they are one major source.

Existing Approvals

The source was issued Part 70 Operating Permit No. T 089-32114-00565 on December 14, 2012. The source has since received the following approvals:

(a) Administrative Amendment No. 089-34438-00565, issued on September 23, 2014; and

(b) Administrative Amendment No. 089-34953-00565, issued on October 23, 2014.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O_3	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard. [1][2]
$PM_{2.5}$	Unclassifiable or attainment effective February 6, 2012, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3 for the 1-hour standard.

[2]The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.

(a) Ozone Standards
U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

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

(c) Other Criteria Pollutants
Lake 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

The source's primary operation is commercial printing (gravure) and falls within the Standard Industrial Classification (SIC) Code 2754. In addition to the commercial printing, the source performs the manufacturing of pigments and lacquers. The manufacturing of pigments falls within the SIC Code 2816 and the manufacturing of lacquers falls within the SIC Code 2851. Both the manufacturing of pigments and lacquers would be considered a chemical process plant[1]. However, the actual manufacturing of pigments and lacquers only amounts to a small percentage of the source's total production operations.

EPA introduced the "primary activity" test as a means of discerning the scope of a source with operations falling into separate SIC codes[2].

> Each source is to be classified according to its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Thus, one classification encompasses both primary and support facilities, even when the latter includes units with a different two-digit SIC code.

Since the primary activity is commercial printing and the major group SIC code is 27, this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and since there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants 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.

However, for the secondary activities (pigment and lacquer production), which are each considered one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7 as a chemical process plant, fugitive emissions (from pigment and lacquer production) are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability, The source-wide limited potential to emit VOC after issuance of SPM 089-37100-00565 is less than 100 tons per year, which is less than the Emission Offset threshold of 100 tons per year.

Footnotes:

1. In the absence of elaboration in the preamble to the Operating Permit Program Rule Final Rule, dated July 21, 1992, the Standard Industrial Classification Manual (SIC Manual), 1987, Executive Office of the President Office of Management and Budget offers some guidance. Chemical process plants are best categorized as Major Group 28.

2. 45 Federal Register 52676, 52695 (August 7, 1980).

Greenhouse Gas (GHG) Emissions

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

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is

invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

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:

	Source-Wide Emissions Before Modification (ton/year)									
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Lead**	**Single HAP***	**Combined HAPs**
Total for Source	0.09	0.37	0.37	0.03	4.87	48.79	4.09	--	<10	<25
PSD Major Source Thresholds	250	250	250	250	250	---	250	--	--	--
Emission Offset Major Source Thresholds	---	---	---	---	100	100	---	--	--	--
*Single highest source-wide HAP.										

(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 not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

(c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(d) These emissions are based on the Technical Support Document for Administrative Amendment No. 089-34953-00565.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Eckart America on April 15, 2016, relating to the addition of a printing press, mixers, tanks, lacquer production operation, and a water-based ink production area. The following is a list of the proposed or modified emission units and pollution control devices:

New Units:

(a) One (1) packaging rotogravure printing press, identified as C-8, installed in 1985, re-permitted in 2016, with a maximum line speed of 250 feet per minute, a maximum coating rate of 0.0318 g/cm2, and a maximum printing width of 64.0 inches, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8.

Under 40 CFR 63, Subpart KK, C-8 is considered an existing affected source.

(b) Eight (8) volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

(c) One (1) lacquer production area, re-permitted in 2016, with a maximum capacity of 115,632 tons of product produced per year, consisting of the following equipment:

(1) One (1) Schold mixer, installed in 1993, identified as 718, with no controls, with a maximum capacity of thirty (30) horsepower.

(2) Two (2) Schold mixers, both installed in 1993, identified as 713 and 714, with no controls, each with maximum capacity of thirty (30) horsepower.

(3) One (1) Schold Mixer, identified as 717, installed in 1993, with no controls, with a maximum capacity of thirty (30) horsepower.

(4) One (1) 1400 gallon R-Coat Tank.

(5) Three (3) 2300 gallon Intermediate Tanks.

(6) Three (3) 1170 gallon Intermediate Tanks.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

(d) Insignificant Activities:

One (1) water-based ink production area, with a maximum capacity of 241.1 tons of material mixed per year, consisting of the following equipment:

(1) Two (2) Mounted Drum Mixers, with no controls, with a maximum capacity of five (5) horsepower, each.

(2) Eight (8) bench top air-driven mixers, with no controls.

(e) Insignificant Activities:

(1) One (1) 50 gallon parts washer.

(2) One (1) IKA T25 Ultra Turrax Mixer, with a maximum capacity of two-thirds (2/3) HP.

(3) Two (2) IKA T50 Ultra Turrax Mixers, with a maximum capacity of one (1) HP

(4) Silverson L4RT-A Mixer, with a maximum capacity of one-third (1/3) HP.

(5) Dispermat CV Mixer, with a maximum capacity of two-thirds (2/3) HP.

(6) Two (2) Air Mixers, with a maximum capacity of two (2) HP each.

Modified Units:

(a) One (1) pigment production area, with a maximum capacity of 350.4 tons of product produced per year, consisting of the following equipment:

(1) One (1) Hockmeyer mixer with one (1) homogenizer, identified as PP-2, constructed in 2005, with maximum capacity of fifty (50) horsepower.

(2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in 2007, with maximum capacity of fifty (50) horsepower.

(3) One (1) Schold Mixer, identified as 701, constructed in 1974, with no controls, with a maximum capacity of thirty (30) horsepower.

(4) Five (5) stripper tubs, two (2) dirty acetone tanks, five (5) product tanks, two (2) sludge tanks, three (3) reclaim acetone tanks, and two (2) acetone distillation units.

(5) One (1) totally enclosed Ross Mixer with one (1) condenser, identified as PP-4, constructed in 2014, with a maximum capacity of 9.5 horsepower.

(6) One (1) SWECO screener, with a maximum capacity of 0.5 horsepower.

Enforcement Issues

There are no pending enforcement actions related to this modification.

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 tables are 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.

New Units

	PTE Before Controls of the New Emission Units (ton/year)								
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP**	**Total HAPs**
C-8 Press	--	--	--	--	--	19381.36	--	--	--
C-8 Thermal Oxidizer	0.07	0.29	0.29	0.02	3.86	0.21	3.25	0.07 (Hexane)	0.07
Eight (8) Storage Tanks	--	--	--	--	--	0.40	--	0.06 (MIBK)	0.06
Water-Based Mixing	--	--	--	--	--	2.38	--	--	--
Lacquer Production	--	--	--	--	--	37.0	--	0.37 (Ethylbenzene)	0.37
Parts Washer	--	--	--	--	--	0.01	--	--	0.01
Total:	**0.07**	**0.29**	**0.29**	**0.02**	**3.86**	**19421.36**	**3.25**	**0.37 (Ethylbenzene)**	**0.51**

Modified Unit: Pigment Production and C-9

	PTE Change of the Modified Emission Unit(s)/Process (ton/year)								
Pigment Production and C9	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP**	**Combined HAPs**
Pigment Production PTE Before Modification	--	--	--	--	--	34.31	--	1.96	1.96
Pigment Production PTE After Modification	--	--	--	--	--	121.69	--	--	--
Pigment Production PTE Increase	--	--	--	--	--	*87.38*	--	*0*	*0*
C-9 PTE Before Modification	--	--	--	--	--	4486.22	--	2004.92	2004.92
C-9 PTE After Modification	--	--	--	--	--	8751.21	--	2066.79	2066.79
C-9 PTE Increase	--	--	--	--	--	4299.30	--	61.87 (MIBK)	61.87
Total PTE Increase From Modified Units	**--**	**--**	**--**	**--**	**--**	**4386.68**	**--**	**61.87 (MIBK)**	**61.87**

	Total PTE Increase Due to the Modification (ton/year)								
	PM	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP**	**Combined HAPs**
PTE of New Emission units	0.07	0.29	0.29	0.02	3.86	19421.4	3.25	0.37 (Ethylbenzene)	0.51
PTE Increase of Modified Emission Units/Process	--	--	--	--	--	4368.68	--	61.87 (MIBK)	59.91
Total PTE of the Modification	**0.07**	**0.29**	**0.29**	**0.02**	**3.86**	**23808.05**	**3.25**	**61.87 (MIBK)**	**60.42**

Appendix A of this TSD reflects the potential emissions of the modification in detail.

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit VOC at greater than or equal to twenty-five (25) tons per year.

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification makes a significant change to existing monitoring conditions..

Permit Level Determination – PSD or Emission Offset

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

	Project Emissions (ton/yr)						
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$***	**SO_2**	**NO_X**	**VOC**	**CO**
C-8 Thermal Oxidizer	0.07	0.29	0.29	0.02	3.86	0.21	3.25
Eight (8) storage tanks	--	--	--	--	--	0.40	--
Water-based mixing operations	--	--	--	--	--	2.38	--
Parts Washer	--	--	--	--	--	0.01	--
Lacquer production	--	--	--	--	--	96.00**	--
C-8 Press	--	--	--	--	--		--
C-9 Press	-	-	-	-	-		-
Total for Modification	**0.07**	**0.29**	**0.29**	**0.02**	**3.86**	**<100****	**3.25**
PSD Major Source Thresholds	250	NA	250	250	250	NA	250
Emission Offset Major Source Thresholds	---	100	---	---	100	100	---

*$PM_{2.5}$ listed is direct $PM_{2.5}$.
** VOC emissions from presses C-8, C-9, pigment production, and lacquer production are limited to 96.0 tons per twelve (12) consecutive month period.

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

(b) This modification to an existing minor Emission Offset stationary source is not major because the emissions increases of NOx and VOC are less than the Emission Offset major source threshold. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

PTE of the Entire Source After Issuance of the Part 70 Source Modification

The table below summarizes the potential to emit of the entire source.

	Source-wide Emissions After Issuance (tons/year)								
Process/ Emission Unit	PM	PM10	PM2.5 *	SO2	NOx	VOC **	CO	Total HAPs ***	Worst Single HAP ***
Press C-9	-	-	-	-	-	96.0	-	23.5	9.9 (MIBK)
Pigment Production	-	-	-	-	-		-		
Press C-8	-	-	-	-	-		-		
Lacquer Production	-	-	-	-	-				
C-9 Thermal Oxidizer	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03 (Hexane)
C-8 Thermal Oxidizer	0.07	0.29	0.29	0.02	3.86	0.21	3.25	0.07	0.07 (Hexane)
C-9 Hot Oil System	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03 (Hexane)
Natural Gas-Fired Boilers	0.04	0.17	0.17	0.01	2.19	0.12	1.84	0.04	0.04 (Hexane)
R&D Spray Booth	-	-	-	-	-	0.001	-	-	-
Water-based Ink Mixing	-	-	-	-	-	2.38	-	-	-
Tanks	-	-	-	-	-	0.49	-	0.06	0.06
Parts Washer	-	-	-	-	-	0.01	-	-	-
Roadways - Fugitive Emissions (not counted)	0.06	0.01	negl.	-	-	-	-	-	-
Total PTE of Entire Source	**0.18**	**0.72**	**0.72**	**0.06**	**9.49**	**99.31**	**7.97**	**23.74**	**9.96 (MIBK)**
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	NA	250	250	250	NA	250	-	-
Emission Offset/ Nonattainment NSR Major Source Thresholds	-	100	-	-	100	100	-	-	-

negl. = negligible
*$PM_{2.5}$ listed is direct $PM_{2.5}$.

** VOC emissions from presses C-8, C-9, pigment production, and lacquer production are limited to 96.0 tons per 12 consecutive month period.
*** Single HAP limit < 9.9 tons per year; Total HAPs limit < than 23.5 tons per year, to render the source an area source for HAPs.

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) This existing minor Emission Offset stationary source will continue to be minor under 326 IAC 2-3 because the emissions of the nonattainment pollutant VOC will continue to be less than the Emission Offset major source thresholds. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The new storage tanks are not subject to the requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, (40 CFR 60.110b, Subpart Kb), because the storage tanks have storage capacities below 75 cubic meters.

(b) The new storage tanks are not subject to the requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, (40 CFR 60.110, Subpart K), because the storage tanks each have storage capacity of less than 40,000 gallons.

(c) The proposed printing press (C-8) is not subject to the requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, (40 CFR 60.430, Subpart QQ), because the printing press is not a publication press.

(d) The printing press (C-8) is not subject to the requirements of the New Source Performance Standard for the Pressure Sensitive Tape and Label Surface Coating Operations, (40 CFR 60.440, Subpart RR), because the printing press does not print pressure sensitive labels.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(e) This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Organic Liquids Distribution, Subpart EEEE (incorporated as reference in 326 IAC 20-83) because while this source, after limits, is an area source of HAPs, the eight (8) volatile liquid storage tanks being added to the permit were subject to Subpart EEEE as a major source during the initial Part 70 permitting process. Because these units were subject to this subpart upon the initial compliance date, the tanks will continue to be subject to Subpart EEEE.

Nonapplicable portions of the NESHAP will not be included in the permit. The eight (8) volatile organic liquid storage tanks being added to the permit and their associated loading equipment are subject to the following portions of Subpart EEEE:

(1) 40 CFR 63.2334(a)
(2) 40 CFR 63.2338(a-c), (f)
(3) 40 CFR 63.2342(b)(1), (d)

(4) 40 CFR 63.2343(a), (d)
(5) 40 CFR 63.2350
(6) 40 CFR 63.2370(c)
(7) 40 CFR 63.2382(a), (b)(1)
(8) 40 CFR 63.2386(a), (b), (c)(1-3), (d)(3)(i), (d)(3)(ii), (d)(4)(i), (e)
(9) 40 CFR 63.2390(a), (d)
(10) 40 CFR 63.2394
(11) 40 CFR 63.2398
(12) 40 CFR 63.2402
(13) 40 CFR 63.2406
(14) 40 CFR 63, Subpart EEEE Table 1

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63 Subpart EEEE.

(f) The proposed printing press C-8 is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, Subpart KK (incorporated as reference in 326 IAC 20-18) because while this source, after limits, is an area source of HAPs, the source was a major source subject to Subpart KK during the initial Part 70 permitting process. Because these units and processes were subject to this subpart upon the initial compliance date, these units will continue to be subject to Subpart KK.

Nonapplicable portions of the NESHAP will not be included in the permit. The printing press C-8 and all pigment and ink mixing processes are subject to the following portions of Subpart KK:

(1) 40 CFR 63.820(a)(1), (b), (c)
(2) 40 CFR 63.821
(3) 40 CFR 63.822
(4) 40 CFR 63.823
(5) 40 CFR 63.825(a), (b), (d), (h)
(6) 40 CFR 63.826(a)
(7) 40 CFR 63.827(b)(2), (c)(2), (d-f)
(8) 40 CFR 63.828(a)(1-2, 4(i), 5)
(9) 40 CFR 63.829(a-c, e-h)
(10) 40 CFR 63.830
(11) 40 CFR 63, Subpart KK Table 1

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63 Subpart KK.

(g) The new parts washer, constructed in 2016, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T, because it does not use halogenated solvents.

Compliance Assurance Monitoring (CAM):

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

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

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

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

limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

(c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO_2 and NO_X under the Acid Rain Program.

(d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

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:

Emission Unit / Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Printing Press C8/VOC	TO	326 IAC 2-3	>100	<100	Y	N
Printing C9/VOC	TO	326 IAC 2-3	>100	<100	Y	N
Pigment Production Mixers Myers and Ross (each)/VOC	Condensers	326 IAC 2-3	>100	<100	Y	N
Lacquer Production Mixers (each)/VOC	None	326 IAC 2-3	<100	<100	N	N
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy						
Controls: TO = Thermal Oxidizer						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to C8 and C9, and Myers and Ross mixers at the Pigment Production area, which are each considered as an "other unit," for VOC upon issuance of the Part 70 Permit Renewal. A CAM plan must be submitted as part of the Part 70 Operating Permit Renewal application.

State Rule Applicability Determination

Due to the modification at this source, state rule applicability has been reviewed as follows:

326 IAC 2-2 and 326 IAC 2-3 (PSD and Emission Offset)
PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

In order to render the requirements of 326 IAC 2-3 (Emission offset) not applicable, the Permittee shall comply with the following:

(a) The emissions of VOC from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 96.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of C-9 will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons of combined HAPs. However, the source shall take limits to stay below the threshold. Therefore, 326 IAC 2-4.1 will not apply.

In order to render the requirements of 326 IC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and render the source minor under Section 112 of the Clean Air Act, the Permittee shall comply with the following:

(a) The emissions of a single HAP (MIBK) from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 9.9 tons per year; and

(b) The emissions of total HAPs from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 23.5 tons per year.

Compliance with these limits, combined with the potential to emit of any single HAP and the potential to emit of all total combined HAPs from all other emission units at this source, shall limit the source-wide potential to emit of any single HAP (MIBK) to less than ten (10) tons per twelve (12) consecutive month period, and the potential to emit of combined HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and will render the source minor under Section 112 of the Clean Air Act.

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

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Although this source is located in Lake County, it is not specifically listed in 326 IAC 6.8 (Particulate Matter Limitations for Lake County) and does not have a potential to emit over 100 tons per year of PM, nor actual emissions over 10 tons per year of PM. Therefore, this source is not subject to the requirements of 326 IAC 6.8.

326 IAC 7 (Sulfur Dioxide Rules)
No emission unit at this source emits has the potential to emit over twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, the source is not subject to the requirements of 326 IAC 7.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the Permittee shall comply with the following:

(a) The VOC emissions from each mixer (PP-2, PP-1, 701, and PP-4) at the pigment production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The VOC emissions from each mixer (718, 713, 714, and 717) at the lacquer production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits will render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to the mixers PP-2, PP-1, 701, PP-4, 718, 713, 714, and 717.

The coating presses (C-8 and C-9) have the potential to emit VOC greater than 25 tons per year, each. However, pursuant to 326 IAC 8-1-6(3)(A), since these units are subject to 326 8-5-5, these units are not subject to 326 IAC 8-1-6.

326 IAC 8-3 (Organic Solvent Degreasing Operations)
The potential to emit of VOC from the new 50 gallon parts washer is less than 15 pounds per day. Pursuant to 326 IAC 8-1-1(b), the requirements under 326 IAC 8-3 do not apply.

326 IAC 8-5-5 (Graphic Arts Operations)
The coating presses (C-8 and C-9) are located in Lake County and have a potential to emit VOC greater than or equal to twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-5-5 are applicable to these units. Because the units are subject to 326 IAC 8-5-5, these units are subject to the record keeping and reporting requirements of 326 IAC 8-1-9 through 326 IAC 8-1-12.

Pursuant to 326 IAC 8-5-5(e), the Permittee shall:

(a) Not cause, allow, or permit the operation of the presses (C-8 and C-9) unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) Use a capture system in conjunction with each emission control system. The capture system shall attain efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

Pursuant to 326 IAC 8-5-5(a)(3) and 326 IAC 8-1-12, the Permittee shall comply with the following requirements:

(a) Control system operation, maintenance, and testing requirements shall be as follows:

(1) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.

(2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.

(3) The control system shall be tested according to the following schedule and in the following situations:

(A) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(B) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(C) A compliance test shall be performed within ninety (90) days of:

(i) Startup of a new coating facility;

(ii) Changing the method of compliance for coating facility from compliance coatings or daily-weighted averaging to control devices; or

(iii) Receipt of a written request from the department or U.S. EPA.

(iv) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(AA) Test procedures.

(BB) Operating and control system parameters.

(CC) Type of VOC containing process material being used.

(DD) The process and control system parameters that will be monitored during the test.

(b) Monitoring equipment requirements shall be as follows:

If a thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade, whichever is more accurate.

(c) On and after startup of a new coating facility, or upon changing the method of compliance for coating facility from the use of compliance coatings or daily-weighted averaging to control devices, the Permittee shall collect and record each day for each coating facility:

(1) The name and identification of each coating used at each coating facility.

(2) The weight of VOC of each coating used at the facility on a daily basis.

(3) The required overall emission reduction efficiency for each day for each coating facility.

(4) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (a)(3).

(5) Control device monitoring data as follows:

(A) For thermal incinerators, the following:

(i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.

(ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (twenty-eight degrees Centigrade) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(6) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility

(7) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

(d) The Permittee shall notify the department in either of the following instances:

(1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:

(A) Name and location of the coating facility.

(B) Identification of the control system where the noncompliance occurred and the coating facility it served.

(C) Time, date and duration of the noncompliance.

(D) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all applicable requirements of section 10(b) or 11(b) of this rule, respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all requirements of section 10 or 11 of this rule, respectively, applicable to the coating facility subject to 326 IAC 8-5-5.

Compliance with 40 CFR 63.820, Subpart KK shall satisfy the requirements of 326 IAC 8- 1-12.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)
This source is located in Lake County and has a potential to emit VOC greater than or equal to twenty-five (25) tons per year. However, pursuant to 326 IAC 8-7-2(2)(b), because this source is subject to the requirements of 326 IAC 8-5, the requirements of 326 IAC 8-7 are not applicable.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
This source is located in Lake County. Since each new storage tank has a capacity of less than 39,000 gallons, the tanks are subject to the following record keeping and reporting requirements, pursuant to 326 IAC 8-9-6(a) and (b):

(a) The owner or operator of each vessel subject to this rule shall keep all records required by subsection (b) for the life of the vessel.

(b) The owner or operator of each vessel to which section 1 of this rule applies shall maintain a record and submit to the department a report containing the following information for each vessel:
(1) The vessel identification number.
(2) The vessel dimensions.
(3) The vessel capacity.
(4) A description of the emission control equipment for each vessel described in section 4(a) and 4(b) of this rule, or a schedule for installation of emission control equipment on vessels described in section 4(a) or 4(b) of this rule with a certification that the emission control equipment meets the applicable standards.

Compliance Determination and Monitoring Requirements

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

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

The Compliance Determination Requirements applicable to this modification are as follows:

(a) The coating presses C-8 and C-9 have applicable compliance determination conditions as specified below:

(1) The Permittee must operate the thermal oxidizers at all times coating presses C-8 and C-9 are in operation, in order to comply with the requirements of 326 IAC 8-1-2(a) and 326 IAC 8-5-5.

(2) The Permittee must comply with the requirements of 326 IAC 8-1-9 and 326 IAC 8-1-12.

(b) The pigment production mixers have applicable compliance determination conditions as specified below:

(1) The condensers must operate at all times the Myers mixer are in operation, and be maintained within manufacturer specifications.

(2) The Permittee must maintain records of materials usage and product formulation data for all coatings manufactured in the pigment production and lacquer production areas.

(c) The lacquer production area has applicable compliance determination conditions as specified below:

(1) The Permittee must maintain records of materials usage and product formulation data for all coatings manufactured in the lacquer production area.

(d) Testing Requirements

Summary of Testing Requirements				
Emission Unit	**Control Device**	**Pollutant**	**Frequency of Testing**	**Limit or Requirement**
C-8	Thermal oxidizer	VOC and HAP	Every 2.5 years from latest valid compliance demonstration	326 IAC 2-3; 326 IAC 2-4.1; 40 CFR 63 326 IAC 8-5-5: destruction efficiency of at least 90% of nonmethane VOC; overall control efficiency of at least 65%
C-9	Thermal oxidizer	VOC and HAP	Every 2.5 years from latest valid compliance demonstration	326 IAC 2-3; 326 IAC 2-4.1; 40 CFR 63 326 IAC 8-5-5: destruction efficiency of at least 90% of nonmethane VOC; overall control efficiency of at least 65%

The Compliance Monitoring Requirements applicable to this modification are as follows:

(a) The coating presses C-8 and C-9 have applicable compliance monitoring conditions as specified below:

(1) The thermal oxidizers for C-8 and C-9 must have continuous monitoring systems measuring the operating temperatures of the thermal oxidizers.

(2) The duct pressure or fan amperage for each of the thermal oxidizers must be observed once per day when the thermal oxidizers are in operation. The duct pressure or fan amperage will be maintained within the normal range as established during the last compliant stack test.

Control	Parameter	Frequency	Range	Excursions and Exceedances
Thermal oxidizers for C-8 and C-9	3-hour average temperature	Continuous (minimum of once every 15 minutes)	at or above the minimum temperature determined during latest valid stack test	Response steps
Thermal oxidizer for C-8 and C-9	Duct pressure or fan amperage	Daily	Normal/abnormal as determined during the latest compliant stack test	Response steps

These monitoring conditions are necessary because the thermal oxidizers for C-8 and C-9 must be operating properly in order to render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-4.1 not applicable, maintain area source status under 40 CFR 63, and satisfy the requirements of 40 CFR 63 Subpart KK, and 326 IAC 8-5-5.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 089-37086-00565. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(1) Section A.1 has been revised for clarification purposes.

(2) Section A.2 - Source Definition has been revised. The two plants identified as Source 1 and Source 2 have been deemed to comprise a single source.

(3) Sections A.3 and A.4 has been revised to add the new emission units, including insignificant activities, and to incorporate changes to modified units.

(4) Section D.1 has been revised to relocate the requirements for the Pigment Production area equipment from Section D.2.

(5) Condition D.1.1 has been revised to include changes to VOC emissions limitations to render the requirements under 326 IAC 2-3 (Emission Offset) not applicable to the source.

(6) Condition D.1.2 - Volatile Organic Compound (VOC)[326 IAC 8-1-6] has been added to include VOC limitations for the mixers at the Pigment Production and Lacquer Production areas to avoid 326 IAC 8-1-6.

(7) Condition D.1.3 - Hazardous Air Pollutants has been added to included emissions limitations for single and combined HAPs, in order to maintain area source status for the entire source under 40 CFR 63.

(8) Condition D.1.8 - Testing Requirements has been added to include testing requirements for the thermal oxidizers for presses C-8 and C-9.

(9) Section D.2 has been deleted in its entirety. The requirements applicable to the pigment production and lacquer production areas have been relocated to Section D.1.

(10) Section D.4 has been deleted, because the source does not include any regulated degreasers subject to 326 IAC 8-3. The new 50 gallon parts washer has VOC potential to emit of less than 15 pounds per day, and is therefore not subject to the requirements of 326 IAC 8.

(11) IDEM revised Sections E.1 and E.2 for clarification purposes.

(12) The Quarterly Report forms have been revised or added for the new emissions limitations.

(13) IDEM, OAQ added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Sections D.1 through D.3 and D.5 through D.7 to clarify the authority of these conditions.

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

The Permittee owns and operates a stationary commercial rotogravure printing and pigment manufacturing operation.

Source Address:	650 West 67th Avenue Suite 200, Schererville, Indiana 46375
General Source Phone Number:	219-864-48~~66~~**72**
SIC Code:	**2754 (Commercial Printing, Gravure), 2816 (Inorganic Pigments), 2851 (Paints, Varnishes, Lacquers, Enamels, and Allied Products)**~~2754, 2816~~
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-7]

This stationary commercial rotogravure printing and pigment and lacquer manufacturing site consists of two (2) separate sources:

(1) Source 1 (~~Avery Dennison DES~~ **Eckart America**) located at 650 West 67th Avenue, **Suite 200,** Schererville, Indiana 46375; and

(2) Source 2 (~~Eckart America~~ **Actega North America**) is located at 650 West 67th Avenue, Suite 200, Schererville, Indiana 46375.

~~In order to consider both plants as one single source, all three of the following criteria must be met:~~

~~(1) The plants must have common ownership/control;~~

~~(2) The plants must have the same SIC code; and~~

~~(3) The plants must be located on contiguous or adjacent properties.~~

These plants are located on the same property, ~~meeting the third part of the major source definition. However, since the plants do not meet all three parts of the major source definition, IDEM, OAQ has determined that the Eckart America plant is not part of the same major source as the Avery Dennison DES plant, as defined by 326 IAC 2-7-1(22). This conclusion was initially determined under Part 70 Operating Permit (T089-32114-00565) on May15, 2012.~~**have the same two-digit SIC code, and are owned and controlled by the same parent company. Eckart America and Actega North American are considered part of the same major source.**

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

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

(a) One (1) three-station coater packaging rotogravure printing press, identified as C-9, constructed in 2001, **with a maximum line speed of 1500 feet per minute, a maximum coating rate of 0.000693 g/cm2, and a maximum printing width of 72.8 inches,** with emissions controlled by one (1) ~~3.84~~ **4.0** MMBtu/hr thermal oxidizer, which includes a ~~2.4~~ **4.0** MMBtu/hr natural gas-fired ~~heat recovery unit~~ **hot oil system**, exhausting to one (1) stack C-9.

Under 40 CFR 63, Subpart KK, this is considered as an existing **affected source**

~~packaging rotogravure printing press~~.

(b) One (1) pigment production area**, approved in 2016 for modification, with a maximum capacity of 350.4 tons of product per year**, consisting of the following equipment:

(1) One (1) Hockmeyer mixer **with one (1) homogenizer**, identified as PP-2, constructed in ~~2007~~**2005**, **with no controls,** with maximum capacity of fifty (50) horsepower.

(2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in ~~2006~~ **2007**, with maximum capacity of fifty (50) horsepower.

(3) ~~Two~~ **One** (~~2~~**1**) Schold Mixer~~s~~, identified as 701 ~~and 717~~, constructed in 1974 ~~and 1993 respectively~~, **with no controls,** ~~each~~ with a maximum capacity of thirty (30) horsepower.

(4) Five (5) stripper tubs, **two (2) dirty acetone tanks,** ~~one (1) homogenizer tub, three (3) spent acetone tanks,~~ five (5) product tanks, ~~and three (3)~~ **two (2)** sludge tanks**, three (3) reclaim acetone tanks, and two (2) acetone distillation units**.

(5) One (1) totally enclosed Ross Mixer with one (1) condenser, identified as PP-4, constructed in 2014, with a maximum capacity of 9.5 horsepower.

(6) One (1) SWECO screener, with a maximum capacity of 0.5 horsepower.

(c) ~~Seven (7)~~ **Fifteen (15)** volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

(d) One (1) packaging rotogravure printing press, identified as C-8, permitted in 2016, with a maximum line speed of 250 feet per minute, a maximum coating rate of 0.0318 g/cm2, and a maximum printing width of 64.0 inches, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8.

Under 40 CFR 63, Subpart KK, C-8 is considered an existing affected source.

(e) One (1) lacquer production area, re-permitted in 2016, with a maximum capacity of 115,632 tons of product produced per year, consisting of the following equipment:

(1) One (1) Schold mixer, installed in 1993, identified as 718, with no controls, with a maximum capacity of thirty (30) horsepower.

(2) Two (2) Schold mixers, installed in 1993, identified as 713 and 714, with no controls, each with maximum capacity of thirty (30) horsepower.

(3) One (1) Schold Mixer, installed in 1993, identified as 717, with no controls, with a maximum capacity of thirty (30) horsepower.

(4) One (1) 1400 gallon R-Coat Tank.

(5) Three (3) 2300 gallon Intermediate Tanks.

(6) Three (3) 1170 gallon Intermediate Tanks.

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

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

...

(c) **Other emission units, not regulated by a NESHAP, with PM10 and SO2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including:**

(1) One (1) 50 gallon parts washer.

(2) One (1) R& D Spray Booth with a maximum capacity of ten (10) parts per day.

(3) One (1) IKA T25 Ultra Turrax Mixer, with a maximum capacity of two-thirds (2/3) HP.

(4) Two (2) IKA T50 Ultra Turrax Mixers, with a maximum capacity of one (1) HP

(5) Silverson L4RT-A Mixer, with a maximum capacity of one-third (1/3) HP.

(6) Dispermat CV Mixer, with a maximum capacity of two-thirds (2/3) HP.

(7) Two (2) Air Mixers, with a maximum capacity of two (2) HP each.

~~(d) Other emission units, not regulated by a NESHAP, with PM10 and SO2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including:~~

~~(1) Degreasing operations.~~

~~(2) One (1) R& D Spray Booth with a maximum capacity of ten (10) parts per day.~~

(d) One (1) water-based ink production area, with a maximum capacity of 241.1 tons of material mixed per year, consisting of the following equipment:

(1) Two (2) Mounted Drum Mixers, with no controls, with a maximum capacity of five (5) horsepower, each.

(2) Eight (8) bench top air-driven mixers, with no controls.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) three-station coater packaging rotogravure printing press, identified as C-9, constructed in 2001, **with a maximum line speed of 1500 feet per minute, a maximum coating rate of 0.000693 g/cm2, and a maximum printing width of 72.8 inches,** with emissions controlled by one (1) ~~3.84~~**4.0** MMBtu/hr thermal oxidizer, which includes a ~~2.4~~**4.0** MMBtu/hr natural gas-fired ~~heat recovery unit~~ **hot oil system**, exhausting to one (1) stack C-9.

Under 40 CFR 63, Subpart KK, this is considered as an existing **affected source** ~~packaging rotogravure printing press~~.

(b) One (1) pigment production area, approved in 2016 for modification, with a maximum capacity of 350.4 tons of product produced per year, consisting of the following equipment:

(1) One (1) Hockmeyer mixer with one (1) homogenizer, identified as PP-2, constructed in 2005, with maximum capacity of fifty (50) horsepower.

(2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in 2007, with maximum capacity of fifty (50) horsepower.

(3) One (1) Schold Mixer, identified as 701, constructed in 1974, constructed in 1993 with no controls, with a maximum capacity of thirty (30) horsepower.

(4) Five (5) stripper tubs, two (2) dirty acetone tanks, five (5) product tanks, two (2) sludge tanks, three (3) reclaim acetone tanks, and two (2) acetone distillation units.

(5) One (1) totally enclosed Ross Mixer with one (1) condenser, identified as PP-4, constructed in 2014, with a maximum capacity of 9.5 horsepower.

(6) One (1) SWECO screener, with a maximum capacity of 0.5 horsepower.

(d) One (1) packaging rotogravure printing press, identified as C-8, installed in 1985, re-permitted in 2016, with a maximum line speed of 250 feet per minute, a maximum coating rate of 0.0318 g/cm2, and a maximum printing width of 64.0 inches, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8.

Under 40 CFR 63, Subpart KK, C-8 is considered an existing affected source.

(e) One (1) lacquer production area, re-permitted in 2016, with a maximum capacity of 115,632 tons of product produced per year, consisting of the following equipment:

(1) One (1) Schold mixer, installed in 1993, identified as 718, with no controls, with a maximum capacity of thirty (30) horsepower.

(2) Two (2) Schold mixers, installed in 1993, identified as 713 and 714, with no controls, each with maximum capacity of thirty (30) horsepower.

(3) One (1) Schold Mixer, installed in 1993, identified as 717, with no controls, with a maximum capacity of thirty (30) horsepower.

(4) One (1) 1400 gallon R-Coat Tank.

(5) Three (3) 2300 gallon Intermediate Tanks.

(6) Three (3) 1170 gallon Intermediate Tanks.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

...

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

D.1.1 ~~PSD and~~ Emission Offset Minor Limits ~~[326 IAC 2-2]~~[326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the Permittee shall comply with the following:

(1) **The emissions of VOC from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 96.0 tons** ~~The input of VOC to press C-9, including cleanup solvent, shall be limited to 1,266 tons~~ per twelve (12) consecutive month period with compliance determined at the end of each month.

~~(2) The minimum overall VOC control efficiency for the thermal oxidizers for press C-9 shall be 98.5%.~~

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period and shall render ~~326 IAC 2-2 and~~ 326 IAC 2-3 (~~PSD and~~ Emission Offset) not applicable.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the Permittee shall comply with the following:

(a) The VOC emissions from each mixer (PP-2, PP-2, 701, and PP-4) at the pigment production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The VOC emissions from each mixer (718, 713, 714, and 717) at the lacquer production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits will render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to the mixers PP-2, PP-1, 701, PP-4, 718, 713, 714, and 717.

D.1.3 Hazardous Air Pollutants [326 IAC 2-4.1]

In order to render the requirements of 326 IC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and render the source minor under Section 112 of the Clean Air Act, the Permittee shall comply with the following:

(a) The emissions of a single HAP (MIBK) from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 9.9 tons per year; and

(b) The emissions of total HAPs from presses C-8 and C-9, Pigment Production, and Lacquer Production shall not exceed 23.5 tons per year.

Compliance with these limits, combined with the potential to emit of any single and the total combined HAPs from all other emission units at this source, shall limit the source-wide potential to emit of any single HAP (MIBK) to less than ten (10) tons per twelve (12) consecutive month period, and the potential to emit of combined HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the

requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and will render the source minor under Section 112 of the Clean Air Act.

D.1.~~2~~**4** Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 8-5-5(e), the Permittee shall:

(a) Not cause, allow, or permit the operation of the press**es** (**C-8 and** C-9) unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) Use a capture system in conjunction with each emission control system. The capture system shall attain efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes. ~~The overall control efficiency of 98.5% is required to operate presses C-9, to stay below the Emissions Offset Significant level for VOC, satisfying the overall efficiency of 65% requirements under this rule.~~

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

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

D.1.6 VOC Control

In order to assure compliance with Condition D.1.2(a), the two (2) condensers shall operate at all times that the Myers mixer is operated. The condensers shall be operated and maintained according to the manufacturer's specifications.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

Compliance with the VOC emissions limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by maintaining records of usage and maintaining product formulation data for all coatings manufactured in the pigment production facility. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Testing Requirements [326 IAC 2-1.1-11]

In order to determine compliance with Conditions D.1.1, D.1.3 and D.1.4, the Permittee shall conduct a compliance test to verify the overall VOC and HAP control efficiency (capture and destruction efficiency) for the thermal oxidizers for presses C-8 and C-9, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every two and a half (2.5) years from the date of the most recent compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

D.1.9 Volatile Organic Compounds (VOC)

In order to assure compliance with Condition D.1.2, the Permittee shall determine the VOC from each mixer at the Pigment Production and Lacquer Production areas according to the following formulas:

(a) Pigment Production VOC emissions (tons/yr) at each mixer =

Inputs (weight Cake + weight VOC + weight partial product) - output (weight packed product) - acetone emissions (starting weight acetone in cake - ending weight acetone left in finished product) - residue - weight VOC condensed

(b) Lacquer Production VOC emissions (tons/yr) at each mixer =

lacquer production rate (tons/yr) x $EF_{lp,VOC}$ /2000

$EF_{lp,VOC}$ = VOC emission factor for lacquer production (lb VOC per ton lacquer produced)

Where $EF_{lp,VOC}$ = 0.64 lb/ton of lacquer produced

D.1.10 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

(a) In order to assure compliance with Condition D.1.1, the Permittee shall determine the VOC emissions from C-8, C-9, Pigment Production, and Lacquer Production according to the following formula:

(1) VOC emissions (tons per year) =

(VOC Input C-8 x (1-CE_{c-8})+ (VOC Input C-9 x (1-CE_{c-9})) + VOC emissions (pigment production) + VOC emissions (lacquer production)

Where:

(2) VOC emissions (pigment production) =

Inputs (weight Cake + weight VOC + weight partial product) - output (weight packed product) - acetone emissions (starting weight acetone in cake - ending weight acetone left in finished product) - residue - weight VOC condensed

VOC emissions (lacquer production) = lacquer production rate (tons/yr) x $EF_{lp,VOC}$ /2000

$EF_{lp,VOC}$ = VOC emission factor for lacquer production (lb VOC per ton lacquer produced)

(b) In order to assure compliance with Condition D.1.2, the Permittee shall determine the HAP emissions from C-8, C-9, Pigment Production, and Lacquer Production according to the following formulas:

(1) Single HAP emissions (tons per year)=

[Single HAP input at C-8 x (1-CE_{c-8})]+ [Single HAP input at C-9 x (1-CE_{c-9})] + single HAP emissions (pigment production) + single HAP emissions (lacquer production)

(2) Total HAP emissions (tons per year) =

[Total HAP input at C-8 x (1-CE_{c-8})]+ [Total HAP input at C-9 x (1-CE_{c-9})] + total HAP emissions (pigment production) + total HAP emissions (lacquer production)

Where:

CE_{c-8} = overall control efficiency of C-8 as determined during the most recent valid performance test

CE_{c-9} = overall control efficiency of C-9, as determined during the most recent valid performance tests.

Where:

HAP emissions (pigment production) =

= ((Inputs (weight Cake + weight solvent + weight partial product) - output (weight packed product) - acetone emissions (starting weight acetone in cake - ending weight acetone left in finished product) - residue - solvent condensed)) x % HAP in solvent

HAP emissions (lacquer production) = lacquer production rate (tons/yr) x $EF_{lp,HAP}$ /2000

$EF_{lp,HAP}$ = HAP emission factor for lacquer production (lb HAP per ton lacquer produced)

D.1.~~4~~**11** VOC Control [326 IAC 8-1-2(a)][326 IAC 8-5-5]

Pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-5-5, and in order to **assure** ~~achieve~~ compliance with Conditions D.1.1 ~~and~~**,** D.1.2, **and D.1.4,** the Permittee shall operate the thermal oxidizer**s** controlling emissions from press**es** ~~C-9~~ **C-8 and C-9** at all times the ~~coater~~ **respective press** is wetted and VOC materials are being applied.

D.1.~~5~~**12** Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices [326 IAC 8-1-9][326 IAC 8-1-12]

...

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

D.1.~~6~~**13** Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer(s) for measuring operating temperature. **For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes.** ~~of the thermal oxidizer. For the purposes of this condition, continuous monitoring shall mean no less often than once per minute.~~ The output of this system shall be recorded as a **3-** ~~three~~ -hour average. **The output of this system shall be recorded as 3-hour average.**. ~~If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Whenever the three (3) hour average temperature is below the three (3) hour average temperature established during the latest stack test that demonstrated compliance, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

(b) The Permittee shall determine the ~~three (3) hourly~~ **3-hour** average temperature from the ~~most recent~~ **latest** valid stack test that demonstrates compliance with the limits **in** ~~of~~ Condition**s** D.1.1, **D.1.3 and D.1.4** ~~as approved by IDEM.~~

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

(d) If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. A 3-hour average temperature reading below the above mentioned 3-hour average temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

...

D.1.~~7~~ **14** Thermal Oxidizer Parametric Monitoring ~~[326 IAC 2-7-5(3)] [40 CFR 64]~~

(a) The Permittee shall determine the appropriate ~~range of~~ duct pressure or fan amperage ~~for the thermal oxidizer~~ from the ~~most recent~~ **latest** valid stack test that demonstrates compliance with **limits in** ~~the limit set by~~ Condition**s** D.1.1**, D.1.3 and D.1.4** ~~as approved by IDEM~~.

(b) The duct pressure or fan amperage~~, whichever is monitored by the Permittee under this condition~~ shall be observed at least once per day when the thermal oxidizer ~~is~~ in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

(c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.~~8~~**15** Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, D.1.2, D.1.3, and D.1.7, the Permittee shall maintain the following records for the press**es** identified as **C-8 and** C-9, **the Pigment Production area, and the Lacquer Production area,** in accordance with (1) through (**4**~~7~~) below. Records maintained for (1) through (**4**~~7~~) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP **emissions** ~~input~~ limits ~~and thermal oxidizer temperature requirements~~ established in Conditions D.1.1, D.1.2, and D.1.3.

(1) The amount and VOC and HAP content of each ink, coating material, wash, and cleanup solvent used on a monthly basis for presses C-8 and C-9. Records shall include purchase orders, invoices, supplier data sheets, material safety data sheets (MSDS), and pigment product formulation data necessary to verify the type and amount used;

(2) The total VOC **and HAP** usage **at C-8 and C-9** for each month;

~~(3) The continuous thermal oxidizer temperature; and~~

(3) The weight of VOCs and HAPs emitted at C-8 and C-9 for each compliance period;

(4) The monthly records of the weight of input and products at each mixer at the pigment production area;

(5) The monthly records of the weight of products at each mixer at the lacquer production area;

(6) The monthly records of VOC emissions at each mixer at the pigment production area;

(7) The monthly records of VOC emissions at each mixer at the lacquer production area.

~~(4) The weight of VOCs emitted for each compliance period.~~

(b) To document the compliance status with Condition D.1.13, the Permittee shall maintain continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(c) To document the compliance status with Condition D.1.14, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizers. The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

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

D.1.~~9~~**16** Reporting Requirements

(a) ...

(b) A quarterly summary of the information to document the compliance status with Condition**s** D.1.1**, D.1.2 and D.1.3** shall be submitted **using the reporting forms at the end of this permit or their equivalent**, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

~~SECTION D.2 FACILITY OPERATION CONDITIONS~~

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

~~(b) One (1) pigment production area, consisting of the following equipment:~~

~~(1) One (1) Hockmeyer mixer, identified as PP-2, constructed in 2007, with maximum capacity of fifty (50) horsepower.~~

~~(2) One (1) totally enclosed Myers mixer with two (2) condensers, identified as PP-1, constructed in 2007, with maximum capacity of fifty (50) horsepower.~~

~~(3) Two (2) Schold Mixers, identified as 701, constructed in 1974, and 717, constructed in 1993, each with a maximum capacity of thirty (30) horsepower.~~

~~(4) Five (5) stripper tubs, one (1) homogenizer tub, three (3) spent acetone tanks, five (5) product tanks, and three (3) sludge tanks.~~

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

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

~~D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6] and Emission Offset Minor Limit [326 IAC 2-3]~~

~~In order to render the requirements of 326 IAC 2-3 (Emission offset) and 326 IAC 8-1-6 (General Reduction Requirements) not applicable, the Permittee shall comply with the following:~~

~~The pigment produced by the pigment stripper shall be limited to 96.5 tons per 12 month period, rolled on a monthly basis. This is equivalent to volatile organic compound (VOC) potential to emit~~

~~(PTE) of twenty-four (24) tons per 12 month period.~~

~~Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-2 and 326 IAC 2-3 (PSD and Emission Offset) not applicable.~~

~~D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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

~~Compliance Determination Requirements~~

~~D.2.3 VOC Control~~

~~In order to comply with Condition D.2.1, the two (2) condensers shall operate at all times that the Myers mixer is operated. The condensers shall be operated and maintained according to the manufacturer's specifications.~~

~~D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]~~

~~Compliance with the materials throughput and VOC emissions limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by maintaining records of usage and maintaining product formulation data for all coatings manufactured in the pigment production facility. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

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

~~D.2.5 Record Keeping Requirements~~

~~(a) To document the compliance status with Condition D.2.1, the Permittee shall maintain monthly records of the amount of pigment produced by the pigment stripper. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the materials throughput limit established in Condition D.2.1.~~

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

~~D.2.6 Reporting Requirements~~

~~A quarterly summary of the information to document the compliance status with Condition D.2.1 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).~~

SECTION D.~~3~~**2** ~~FACILITY~~ **EMISSIONS UNIT** OPERATION CONDITIONS

~~Facility Description [326 IAC 2-7-5(15)]:~~**Emissions Unit Description:**

(c) ~~Seven (7)~~**Fifteen (15)** volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

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

D.~~3~~**2**.1 Record Keeping Requirements

...

~~SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS~~

~~Emissions Unit Description: Insignificant Activity~~

~~(a) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs, including degreasing operation.~~

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

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

~~D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the cold cleaner degreasing operations are subject to the provisions of 326 IAC 8-3-2 because the degreasing operations were constructed in Lake County prior to January 1, 1980 at a source that has potential VOC emissions greater than 100 tons per year, the Permittee shall:~~

~~(a) Equip the cleaner with a cover;~~

~~(b) Equip the cleaner with a facility for draining cleaned parts;~~

~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~

~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~

~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~

~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

~~D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]~~

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the cold cleaner degreasing operations are subject to the provisions of 326 IAC 8-3-5(a) because the degreasing operations were constructed in Lake County prior to January 1, 1980 at a source that has potential VOC emissions greater than 100 tons per year. The owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:~~

~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~

~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~

~~(B) The solvent is agitated; or~~

~~(C) The solvent is heated.~~

~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~

~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~

~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~

~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~

~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~

~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:~~

~~(1) Close the cover whenever articles are not being handled in the degreaser.~~

~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

SECTION D.**3**~~5~~ EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: ...

...

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

D.**3**~~5~~.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

...

SECTION E.1 ~~FACILITY OPERATION CONDITIONS~~ **NESHAP**

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

(a) One (1) three-station coater packaging rotogravure printing press, identified as C-9, constructed in 2001, **with a maximum line speed of 1500 feet per minute, a maximum coating rate of 0.000693 g/cm2, and a maximum printing width of 72.8 inches,** with emissions controlled by one (1) ~~3.84~~**4.0** MMBtu/hr thermal oxidizer, which includes a ~~2.4~~**4.0** MMBtu/hr natural gas-fired ~~heat recovery unit~~ **hot oil system**, exhausting to one (1) stack C-9.

Under 40 CFR 63, Subpart KK, this is considered as an existing **affected source** ~~packaging rotogravure printing press~~.

(d) One (1) packaging rotogravure printing press, identified as C-8, installed in 1985, re-permitted in 2016, with a maximum line speed of 250 feet per minute, a maximum coating rate of 0.0318 g/cm2, and a maximum printing width of 64.0 inches, controlled by one (1) 9.0 million British thermal units per hour (MMBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack C-8.

Under 40 CFR 63, Subpart KK, C-8 is considered an existing affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements~~: The Priniting and Publishing Industry~~ [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to **National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]**~~NESHAP Subpart KK (National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry [326 IAC 20-1][40 CFR Part 63, Subpart A]~~

(a) Pursuant to 40 CFR **63.1** ~~63.823~~, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1~~-1~~ ~~as specified in Table 1 of~~ **for the emission unit(s) listed above, except as otherwise specified** in 40 CFR Part 63, Subpart KK ~~in accordance with schedule in 40 CFR 63 Subpart KK.~~

...

E.1.2 **Printing and Publishing** NESHAP ~~Subpart KK Requirements~~ [40 CFR 63, Subpart KK] **[326 IAC 20-18]**

~~Pursuant to 40 CFR 63, Subpart KK, the Permittee which engages in printing and publishing shall comply with the following provisions of 40 CFR Part 63, Subpart KK, (included as Attachment A of this permit):~~

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart KK (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-18-1, for the emission unit(s) listed above:

(1) 40 CFR 63.820(a)(1), (b), (c)
(2) 40 CFR 63.821
(3) 40 CFR 63.822
(4) 40 CFR 63.823
(5) 40 CFR 63.825(a), (b), (d), (h)
(6) 40 CFR 63.826(a)
(7) 40 CFR 63.827(b)(2), (c)(2), (d-f)
(8) 40 CFR 63.828(a)(1-2, 4(i), 5)
(9) 40 CFR 63.829(a-c, e-h)

(10) 40 CFR 63.830
(11) 40 CFR 63, Subpart KK Table 1
~~(A) 40 CFR 63.820 Applicability.~~
~~(B) 40 CFR 63.821 Designation of affected sources.~~
~~(C) 40 CFR 63.823 Standards: General.~~
~~(D) 40 CFR 63.825 Standards: Product and packaging rotogravure.~~
~~(E) 40 CFR 63.826 Compliance dates.~~
~~(F) 40 CFR 63.827 Performance test methods.~~
~~(G) 40 CFR 63.828 Monitoring requirements.~~
~~(H) 40 CFR 63.829 Recordkeeping requirements.~~
~~(I) 40 CFR 63, Subpart KK, Table 1~~

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

E.1.3 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

In order to demonstrate compliance with Condition E.1.2, the Permittee shall perform the testing required under 40 CFR 63, Subpart KK, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

SECTION E.2 ~~FACILITY OPERATION CONDITIONS~~**NESHAP**

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

(~~g~~**c**) ~~Seven (7)~~**Fifteen (15)** volatile organic liquid storage tanks and the associated loading equipment. Each tank has a maximum storage capacity of 3,000 gallons and the total actual annual facility-level organic liquid loading volume through transfer racks is less than 800,000 gallons.

Under 40 CFR 63, Subpart EEEE, these units are considered affected facilities.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements~~: Organic Liquids Distribution (Non-Gasoline)~~ [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to ~~NESHAP Subpart EEEE (~~National Emission Standards for Hazardous Air Pollutants **under** ~~for Organic Liquids Distribution (Non-Gasoline) [326 IAC 20-1]~~[40 CFR Part 63**, [326 IAC 20-1][40 CFR 63, Subpart A]**

(a) **Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified** ~~Pursuant to 40 CFR 63.823, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 as specified in Table 12 of 40 CFR Part 63, Subpart EEEE in accordance with schedule~~ in 40 CFR 63 Subpart EEEE.

...

E.2.2 **Organic Liquids Distribution (Non-Gasoline)** NESHAP ~~Subpart EEEE Requirements~~ [40 CFR 63, Subpart EEEE]**[326 IAC 20-83]**

~~Pursuant to 40 CFR 63, Subpart EEEE, the seven (7) volatile organic liquid storage tanks and the associated loading equipment shall comply with the following provisions of 40 CFR Part 63, Subpart EEEE, (included as Attachment B of this permit):~~

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart EEEE (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-83-1, for the emission unit(s) listed above:

(1) 40 CFR 63.2334(a)
(2) 40 CFR 63.2338(a-c), (f)
(3) 40 CFR 63.2342(b)(1), (d)
(4) 40 CFR 63.2343(a), (d)
(5) 40 CFR 63.2350
(6) 40 CFR 63.2370(c)
(7) 40 CFR 63.2382(a), (b)(1)
(8) 40 CFR 63.2386(a), (b), (c)(1-3), (d)(3)(i), (d)(3)(ii), (d)(4)(i), (e)
(9) 40 CFR 63.2390(a), (d)
(10) 40 CFR 63.2394
(11) 40 CFR 63.2398
(12) 40 CFR 63.2402
(13) 40 CFR 63.2406
(14) 40 CFR 63, Subpart EEEE Table 1
~~(A) 40 CFR 63.2334(a)~~
~~(B) 40 CFR 63.2338(a), (b), (c)(1 - (3), (f)~~
~~(C) 40 CFR 63.2342(b)(1), (d)~~
~~(D) 40 CFR 63.2343(a), (d)~~
~~(E) 40 CFR 63.2382(a), (b)(1)~~
~~(F) 40 CFR 63.2386(a), (c)(1) - (3), (d)(3)(i), (d)93)(ii), (d)(4)(i)~~
~~(G) 40 CFR 63.2390(a), (d)~~
~~(H) 40 CFR 63.2394(a), (b), (c)~~
~~(I) 40 CFR 63.2398~~
~~(J) 40 CFR 63.2402~~
~~(K) 40 CFR 63.2006~~

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

Part 70 Quarterly Report

Source Name: Eckart America Corporation
Source Address: 650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565
Facility: **Presses C-8 and C-9,** Pigment Production**, Lacquer Production**
Parameter: Volatile Organic Compound (VOC)
Limit: The **VOC emissions** ~~pigment~~ ~~produced by the pigment stripper~~ shall be limited to 96.~~5~~**0** tons per **twelve (**12**) consecutive** month period, **with compliance determined at the end of each month**~~rolled on a monthly basis~~. ~~This is equivalent to volatile organic compound (VOC) potential to emit (PTE) of twenty-four (24) tons per 12 month period for each facility.~~

QUARTER: YEAR:

Month	~~Pigment Usage~~ **VOC Emissions**	~~Pigment Usage~~ **VOC Emissions**	~~Pigment Usage~~ **VOC Emissions**
	This Month (Tons)	Previous 11 Months (tons)	12 Month Total (Tons)
~~Month 1~~			
~~Month 2~~			
~~Month 3~~			

...

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

Part 70 Quarterly Report

Source Name: Eckart America Corporation
Source Address: 650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565
Facility: Pigment Production Mixers (PP-2, PP-1, 701, and PP-4)
Parameter: Volatile Organic Compound (VOC)
Limit: The VOC emissions from each mixer (PP-2, PP-1, 701, and PP-4) at the pigment production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: **YEAR:**

Month	Pigment Production Mixer ID	Total VOC Emissions	Total VOC Emissions	Total VOC Emissions
		This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
	PP-2			
	PP-1			
	701			
	PP-4			
	PP-2			
	PP-1			
	701			
	PP-4			
	PP-2			
	PP-1			
	701			
	PP-4			

☐ **No deviation occurred in this quarter.**

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

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

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

Part 70 Quarterly Report

Source Name: Eckart America Corporation
Source Address: 650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.: T089-32114-00565
Facility: Lacquer Production Mixers (718,713, 714, and 717)
Parameter: Volatile Organic Compound (VOC)
Limit: The VOC emissions from each mixer (718, 713, 714, and 717) at the lacquer production area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: **YEAR:**

Month	Lacquer Production Mixer ID	Total VOC Emissions	Total VOC Emissions	Total VOC Emissions
		This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
	718			
	713			
	714			
	717			
	718			
	713			
	714			
	717			
	718			
	713			
	714			
	717			

☐ **No deviation occurred in this quarter.**

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

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

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

Part 70 Quarterly Report

Source Name:	Eckart America Corporation
Source Address:	650 W 67th Ave, Suite 200, Schererville, Indiana 46375
Part 70 Permit No.:	T089-32114-00565
Facility:	~~Press C-9~~ **Presses C-8 and C-9, Pigment Production, Lacquer Production**
Parameter:	~~Input of VOC~~ **Single Hazardous Air Pollutant (HAP) Emissions (MIBK)**
Limit:	Less than **9.9** ~~1,266~~ tons per twelve (12) consecutive month period**,** with compliance determined at the end of each month.

QUARTER: YEAR:

Month	**Single HAP Emissions** ~~Column 1~~	**Single HAP Emissions** ~~Column 2~~	**Single HAP Emissions** ~~Column 3~~
	This Month **(tons)**	Previous 11 Months **(tons)**	12 Month Total **(tons)**
~~Month 1~~			
~~Month 2~~			
~~Month 3~~			

...

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

Part 70 Quarterly Report

Source Name: **Eckart America Corporation**
Source Address: **650 W 67th Ave, Suite 200, Schererville, Indiana 46375**
Part 70 Permit No.: **T089-32114-00565**
Facility: **Presses C-8 and C-9, Pigment Production, Lacquer Production**
Parameter: **Total Hazardous Air Pollutants (HAP)**
Limit: **Less than 23.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

QUARTER: **YEAR:**

Month	Total HAP Emissions	Total HAP Emissions	Total HAP Emissions
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ **No deviation occurred in this quarter.**

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

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

...

Additional Changes

The changes listed below have been made to Part 70 Operating Permit No. 089-32114-00565 order to update language to the most recent model.

Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(1) IDEM, OAQ revised the CAM portion of the Section C.13 Response to Excursions or Exceedances to provide clarity.

In paragraph (II)(c), the acronym QIP is being spelled out as Quality Improvement Plan (QIP) because this is the first time it is mentioned in the condition.
In paragraphs (II)(f) and (II)(h)(1), the reference to paragraph (II)(a)(2) is being changed to paragraph (II)(c). Referencing paragraph (II)(a)(2) is correct, however IDEM, OAQ believes that referencing paragraph (II)(c) provides clarity.

(2) 326 IAC 2-7-1 was updated on August 1, 2014. This rule update changed the rule cite for the definition of "Regulated Pollutant" used only for purposes of "Emission Reporting". Therefore, Section C.15 Emission Statement has been updated accordingly.

SECTION C SOURCE OPERATION CONDITIONS

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

(II) ...

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a **Quality Improvement Plan (**QIP**)**. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

...

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(~~a)(2)~~ **c)**of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

...

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(~~a)(2~~**c**) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) ...

...

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

...

(b) ...

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(~~32~~**33**) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 15, 2016. Additional information was received on May 26, 2016 and July 1, 2016.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-37086-00565. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.

(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: Emissions Calculations
Emission Summary

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Emission Unit	Uncontrolled Potential to Emit (tons/yr)									
	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Total HAPs	Worst HAP	
C-9	-	-	-	-	-	8751.21	-	2066.79	2066.79	MIBK
C-9 T-Ox	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03	Hexane
C-9 Hot Oil System	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03	Hexane
Pigment Production	-	-	-	-	-	121.69	-	-	-	-
C-8	-	-	-	-	-	19381.36	-	-	-	-
C-8 T-Ox	0.07	0.29	0.29	0.02	3.86	0.21	3.25	0.07	0.07	Hexane
Lacquer Production	-	-	-	-	-	37.00	-	0.37	0.37	Ethylbenzene
Natural Gas-Fired Boilers	0.04	0.17	0.17	0.01	2.19	0.12	1.84	0.04	0.04	Hexane
R&D Spray Booth	-	-	-	-	-	0.001	-	-	-	-
Water-based Ink Mixing	-	-	-	-	-	2.38	-	-	-	-
Tanks	-	-	-	-	-	0.40	-	0.06	0.06	MIBK
Parts Washer	-	-	-	-	-	0.01	-	-	-	-
Roadways (Fugitive)	6.41E-02	1.28E-02	3.15E-03	0	0	0	0	0	-	-
Total	**0.18**	**0.72**	**0.72**	**0.06**	**9.49**	**28294.58**	**7.97**	**2067.40**	**2066.85**	**MIBK**

Emission Unit	Limited Potential to Emit (tons per year)									
	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Total HAPs (b)	Worst HAP (b)	
C-9	-	-	-	-	-	96(a)	-	23.50	9.90	MIBK
Pigment Production	-	-	-	-	-		-			
C-8	-	-	-	-	-		-			
Lacquer Production	-	-	-	-	-		-			
C-9 Thermal Oxidizer	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03	Hexane
C-8 Thermal Oxidizer	0.07	0.29	0.29	0.02	3.86	0.21	3.25	0.07	0.07	Hexane
C-9 Hot Oil System	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03	Hexane
Natural Gas-Fired Boilers	0.04	0.17	0.17	0.01	2.19	0.12	1.84	0.04	0.04	Hexane
R&D Spray Booth	-	-	-	-	-	0.001	-	-	-	-
Water-based Ink Mixing	-	-	-	-	-	2.38	-	-	-	-
Tanks	-	-	-	-	-	0.40	-	0.06	0.06	MIBK
Parts Washer	-	-	-	-	-	0.01	-	-	-	-
Roadways (Fugitive)	0.06	0.01	3.15E-03	0	0	0	0	0	-	-
Total	**0.18**	**0.72**	**0.72**	**0.06**	**9.49**	**99.31**	**7.97**	**23.74**	**9.96**	**MIBK**

(a) VOC emissions of 96 total tpy limit for the two coaters (C-8 and C-9), pigment production, and the lacquer production processes in order to avoid 326 IAC 2-3 (Emission Offset) applicability.
(b) Single HAP limit < 9.9 tons per year; Total HAPs limit < than 23.5 tons per year, to render the source an area source for HAPs.

Appendix A: Emissions Calculations
Summary of Modification

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Uncontrolled PTE of Modifications (tons/yr)										
New And Modified Units	PM	PM10	direct PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
C-8 Press	-	-	-	-	-	19381.36	-	-	-	
C-8 TO	0.07	0.29	0.29	0.02	3.86	0.21	3.25	0.07	0.07	Hexane
Eight (8) volatile organic liquid storage tanks	-	-	-	-	-	0.40	-	0.06	0.06	MIBK
Water-based mixing operations	-	-	-	-	-	2.38	-	-	-	-
Lacquer production	-	-	-	-	-	37.00	-	0.37	0.37	Ethylbenzene
Parts Washer	-	-	-	-	-	0.01	-	0.01	0.01	-
Total (New Units)	**0.07**	**0.29**	**0.29**	**0.02**	**3.86**	**19421.36**	**3.25**	**0.51**	**0.37**	**Ethylbenzene**
Pigment production (Before)*	-	-	-	-	-	34.31	-	1.96	1.96	
Pigment production (After)	-	-	-	-	-	121.69	-	-	-	-
C-9 Press (Before)*	-	-	-	-	-	4451.91	-	2004.92	2004.92	MIBK
C-9 Press (After)	-	-	-	-	-	8751.21	-	2066.79	2066.79	MIBK
PTE Modified Units (Before)	-	-	-	-	-	*4486.22*	-	*2006.88*	*2004.92*	*MIBK*
PTE Modified Units (After)	-	-	-	-	-	*8872.90*	-	*2066.79*	*2066.79*	*MIBK*
Increase (Modified Units)	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4386.68**	**0.00**	**59.91**	**61.87**	**MIBK**
Total PTE of the Modification (TPY)	**0.07**	**0.29**	**0.29**	**0.02**	**3.86**	**23808.05**	**3.25**	**60.42**	**61.87**	**MIBK**

* Based on TSD Appendix A for Permit No. 089-34953-00565

Appendix A: Emissions Calculations
Emission Summary

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Potential Product Made (tons/yr)	% Loss	Potential VOC Emissions (tons/yr)	Potential HAP Emissions (tons/yr)*
350.4	34.73%	121.69	0.00

Methodology:
VOC Emissions (tons/yr) = Potential Product Made (tons/yr) x % Loss

The % Loss is based on the worse case emission using 95% confidence interval and is calculated using the following equation:
% Loss = Emissions (lbs/batch) / Batch size

The potential emissions are based on the maximum batch size of the mixer and worse case product with the 95% confidence interval analysis. The facility is limited to being able to produce 350.4 tons of product due to the facility's cake production capacity.

VOC Emissions = Inputs (Weight Cake[1] + Weight VOC + Weight Partial Product[2]) – Output (Weight of Packed Product) – Acetone Emissions (Starting Weight Acetone in Cake[3] – Ending Weight Acetone left in Finished Product[4]) – Residue[5] - Weight VOC Condensed[6]

Notes:
*According to information submitted by the Permittee, there are no HAP emissions from the pigment production process.
1 = Cake is 20% aluminum (max), 13% acetone (minimum), and 67% VOC
2 = Partial product is additional finished product added as work off
3 = Calculated by multiplying Cake Input x 0.13 (13%)
4 = Calculated by multiplying % Acetone in Finished product by total Inputs
5 = 4% Weight of Inputs, based on 2015 Site-specific study
6 = Applies to Meyer Mixer Only, Other Mixers do not have a condenser so therefore will be 0

Appendix A: Emissions Calculations
VOC and HAPs
Tanks

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Tank #	Material	VOC Emissions (lb/yr)	VOC Emissions (ton/yr)	HAP Emissions (ton/yr)
Existing Tanks				
2	Acetone	0	0	0
4	Isopropyl Alcohol	99.45	0.049725	0
5	Acetone	0	0	0
6	MIBK	13.79	0.01	0.01
10	MEK	58.57	0.03	0
11	Glycol Ether PM	0.15	7.50E-05	7.50E-05
15	Acetone	0	0	0
Total		**171.96**	**0.09**	**0.01**
New Tanks				
1	Ethyl Acetate/MIBK	100	0.05	0.007
3	Ethyl Acetate/MIBK	100	0.05	0.007
7	Ethyl Acetate/MIBK	100	0.05	0.007
8	Ethyl Acetate/MIBK	100	0.05	0.007
9	Ethyl Acetate/MIBK	100	0.05	0.007
12	Ethyl Acetate/MIBK	100	0.05	0.007
13	Ethyl Acetate/MIBK	100	0.05	0.007
14	Ethyl Acetate/MIBK	100	0.05	0.007
Total		**800.00**	**0.40**	**0.06**
	Tanks Total:	**971.96**	**0.49**	**0.06**

Highest Single HAP: **0.06** **MIBK**

Appendix A: Emissions Calculations
VOC and HAPs
Coater C-8

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Material	Density (Lb/Gal)	Weight % Volatile	Weight % HAPs	Coat weight (lb/cm-2)	Web width (cm)	Linespeed (cm/min)	Uncontrolled VOC Emissions (tons/year)	Uncontrolled HAPs emissions (tons/year)*
LS6751-269	8.70	85.00%	0.00%	7.00E-05	162.56	7620.00	19381.36	0.00

Worst case solvent and coating assumed.

*Source does not use any HAPs containing materials in this coating press.

Line speed 250 ft/min =	250*12 in*2.54 cm/in =	7620 cm/min
Coat Weight 0.0318 g/cm2 =	0.0318E-03 kg x 2.2 lb/kg =	7.0E-05 lb/cm2
Web width 64 in =	64 x 2.54 cm/in =	162.56 cm

Methodology

VOC Emissions (tons/yr) = Wt. % VOC x Coat Weight (lb/cm2) x Line speed (cm/min) x 60 min/hr x web width (cm) x 8760 hr/yr x 1 ton/2000 lb

HAP Emissions (tons/yr) = Wt. % HAP x Coat Weight (lb/cm2) x Line speed (cm/min) x 60 min/hr x web width (cm) x 8760 hr/yr x 1 ton/2000 lb

Appendix A: Emissions Calculations
Press C-9

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Material	Density (lb/gal)	wt% VOC	wt% HAPs	Coat Weight (lb/cm^2)	Web Width (cm)	Line speed (cm/min)	VOC Emissions (tons/yr)	HAP Emissions (tons/yr)	
L59616 (A-type)	7.35	80%	61%	1.53E-06	184.912	45720	2,710.54	2,066.79	MIBK
L6156 (L-type)	7.30	93%	0%	1.53E-06	184.92	45720	3,151.14	0.00	
L61434 (W-type)	7.00	85%	0%	1.53E-06	184.92	45720	2,889.52	0.00	

Line speed 1500 ft/min =	1500 x 12 in x 2.54 cm/in =	45720 cm/min
Web width 72.8 in =	72.8 x 2.54 cm/in =	184.912 cm
Coat Wt 0.000693 g/cm^2 =	0.000693E-03 kg x 2.2 lb/kg =	1.53E-06 lb/cm^2

Methodology

VOC Emissions (tons/yr) = Wt. % VOC x Coat Weight (lb/cm2) x Line speed (cm/min) x 60 min/hr x web width (cm) x 8760 hr/yr x 1 ton/2000 lb

HAP Emissions (tons/yr) = Wt. % HAP x Coat Weight (lb/Cm2) x Line speed (cm/min) x 60 min/hr x web width (cm) x 8760 hr/yr x 1 ton/2000 lb

Appendix A: Emissions Calculations
Lacquer Production Line

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Potential Production Rate		Emission Factor*	Potential VOC Emissions		HAP content	Potential HAP Emissions**
lb/hour	ton/yr	lb VOC/ ton lacquer	lb/hour	ton/yr	% wt.	ton/yr
26,400	115632	0.640	8.45	**37.00**	**1.00**	**0.37**

Note:
*The emission factor is from Permit 089-3522-00062, issued on August 11, 1995.The emission factor for the lacquer production area is based on the uncontrolled emission factor for polymer blending operations with the production of neoprene obtained from the AirChief CD-ROM database (Version 2.0 Beta, April 1992) and is based on a review of air emissions generated by polychloroprene manufacture prepared for the Industrial Environmental Research.

**HAP emissions conservatively assumed to be 0 (Neoprene only)

Methodology

Potential VOC Emissions (lb/hr) = Potential Production Rate (lb/hr) * Emission Factor (lb VOC/ton lacquer) * 1 ton /2,000 lbs

Potential VOC Emissions (tons/yr) = Potential Production Rate (tons of lacquer produced/yr) x Emission Factor (lb VOC/tons lacquer) x 1 ton /2000 lbs

Appendix A: Emissions Calculations
Natural Gas Fired Boilers

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Unit ID	Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
Boiler F	1.70	1020	14.6
Boiler G	1.70	1020	14.6
Boiler H	1.70	1020	14.6
		Total	**43.8**

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr							
Boiler F	0.01	0.06	0.06	4.38E-03	0.73	0.04	0.61
Boiler G	0.01	0.06	0.06	4.38E-03	0.73	0.04	0.61
Boiler H	0.01	0.06	0.06	4.38E-03	0.73	0.04	0.61
Total	**0.04**	**0.17**	**0.17**	**0.01**	**2.19**	**0.12**	**1.84**

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

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

Hazardous Air Pollutants

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/M	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in t	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/M	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in t	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05
				Total HAPs	**0.04**
				Worst Single HAP	**0.04 Hexane**

Methodology
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Notes
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Eckart America Corporation
Source Address: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
Permit Number: T089-32114-00565
Reviewer: 089-37086-00565/089-37100-00565
Date: Katrina Gilbank/Madhurima Moulik

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per year	Number of one-way trips per year per vehicle	Maximum trips per year (trip/year)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/year)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Tanker In	35.0	1.0	35.0	52.3	1828.8	2640	0.500	17.5
Tanker Out	35.0	1.0	35.0	25.0	875.0	2640	0.500	17.5
Truck In	12.00	1.0	12.00	22.3	267.7	2640	0.500	6.0
Truck Out	12.00	1.0	12.00	6.0	72.0	2640	0.500	6.0
		Totals	**94.0**		**3043.5**			**47.0**

Average Vehicle Weight Per Trip = 32.4 tons/trip
Average Miles Per Trip = 0.50 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	32.4	32.4	32.4	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = mean silt loading value for iron and steel production facilities, AP-42 Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 140 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	3.019	0.604	0.1482	lb/mile
Mitigated Emission Factor, Eext =	2.729	0.546	0.1340	lb/mile
Dust Control Efficiency =	0%	0%	0%	

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Tanker In	2.64E-02	5.28E-03	1.30E-03	2.39E-02	4.78E-03	1.17E-03	2.39E-02	4.78E-03	1.17E-03
Tanker Out	2.64E-02	5.28E-03	1.30E-03	2.39E-02	4.78E-03	1.17E-03	2.39E-02	4.78E-03	1.17E-03
Truck In	9.06E-03	1.81E-03	4.45E-04	8.19E-03	1.64E-03	4.02E-04	8.19E-03	1.64E-03	4.02E-04
Truck Out	9.06E-03	1.81E-03	4.45E-04	8.19E-03	1.64E-03	4.02E-04	8.19E-03	1.64E-03	4.02E-04
Totals	7.09E-02	1.42E-02	3.48E-03	**0.06**	**0.01**	**3.15E-03**	6.41E-02	1.28E-02	3.15E-03

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emissions Calculations
VOC - R&D Spray booth

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Coating	VOC content	Usage (mL/part)	Maximum Parts/Day	VOC (lb/gal)	Potential VOC Emissions	
					(lb/day)	(ton/yr)
Clear	100%	0.3	10	7.05	5.59E-03	1.02E-03
Total					**5.59E-03**	**1.02E-03**

Note:
There are no solids in clear coating.

Methodology:
VOC Emissions (lb/day) = Usage (mL/part) x Maximum Parts/day x 1 gal/3785.411784 mL x VOC (lb/gal)
Conversion factor, 1 gallon = 3785.411784 milliliters
VOC Emissions (tons/yr) = VOC emissions (lb/day) * (365 days/yr) * (1/2000 tons/lb)

Appendix A: Emissions Calculations
Water-based Mixing Operations

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Emission Unit	Material	Site Specific Emission Factor (lb VOC/ton material mixed)	Potential Material Mixed (lb/day)	Potential VOC Emissions (lb/day)	Potential VOC Emissions (tons/yr)	Potential HAP Emissions (tons/yr)*
Mixers (2)	XVG011488 Performa Letdown	19.81	969	9.60	1.75	0.00
Air Mixers (8)	XVG011488 Performa Letdown	19.64	352	3.46	0.63	0.00
			Total	**13.05**	**2.38**	**0.00**

Note:

An emission study was conducted at a sister facility where the worst-case material (VOC concentration twice what is typically run). The material was weighed prior to mixing and then again after mixing for one hour on both the mixer and the air mixer. The difference in the weights represents what was emitted. This emitted rate was used to calculate a lb/ton mixed emission factor. The potential material mixed was based on the maximum number of mixers (2 mixers and 8 air mixers) operating for 24 hours a day.

*According to information submitted by the Permittee, there are no HAP emissions from this process

Methodology:

PTE (lb/day) = Potential Material Mixed (lb/day) x Site-Specific EF (lb VOC/ton material mixed) x 1 ton/2000 lb
PTE (tons/yr) = PTE (lb/day) x 365 days/yr x 1 ton/2000 lb

Appendix A: Emissions Calculations
Parts Washer Degreasing Operations

Company Name: Eckart America Corporation
Address City IN Zip: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
TV Operation Permit : T089-32114-00565
SSM/SPM: 089-37086-00565/089-37100-00565
Reviewer: Katrina Gilbank/Madhurima Moulik

Aqueous Parts Washer PTE

Density (lb/gal)	8.38
Tank Size (gal)	50
Pounds of Cleaner in Tank	419
% VOC in Cleaner	1.02%
Weight of VOC in tank (lb)	4.27
Solvent Usage (gallons/15 weeks)	50
Solvent Usage (gal/hr)	0.02
Solvent Usage (gal/day)	0.48
VOC emitted (lb/hr)	1.70E-03
PTE (VOC) tpy	0.01

Note:
The tanks are refilled every 15 weeks

Methodology:
VOC (lb/hr) = Solvent Usage (gal/hr) x density (lb/gal) x VOC% in solvent
PTE (tons/yr) = VOC (lb/hr) x 8760 hr per yr / 2000 lb per ton

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

Company Name: Eckart America
Source Address: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
Permit Number: 089-32114-00565
Reviewer: 089-37086-00565/089-37100-00565

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr	Emission Unit
9.0	1020	77.3	C-8 Thermal Oxidizer

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.07	0.29	0.29	0.02	3.86	0.21	3.25

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

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	8.1E-05	4.6E-05	2.9E-03	0.07	1.3E-04	**0.07**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.9E-05	4.3E-05	5.4E-05	1.5E-05	8.1E-05	**2.1E-04**
					Total HAPs	**0.07**
					Worst HAP	**0.07**

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.

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

Company Name: Eckart America
Source Address: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
Permit Number: 089-32114-00565
Reviewer: 089-37086-00565/089-37100-00565

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr	Emission Unit
4.0	1020	34.4	C-9 Thermal Oxidizer

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.13	0.13	0.01	1.72	0.09	1.44

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

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.6E-05	2.1E-05	1.3E-03	0.03	5.8E-05	**0.03**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.6E-06	1.9E-05	2.4E-05	6.5E-06	3.6E-05	**9.4E-05**
					Total HAPs	**0.03**
					Worst HAP	**0.03**

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.

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

Company Name: Eckart America
Source Address: 650 West 67th Avenue, Suite 200, Schererville, IN 46375
Permit Number: 089-32114-00565
Reviewer: 089-37086-00565/089-37100-00565

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr	Emission Unit
4.0	1020	34.4	C-9 Hot Oil System

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.13	0.13	0.01	1.72	0.09	1.44

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

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.6E-05	2.1E-05	1.3E-03	0.03	5.8E-05	**0.03**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.6E-06	1.9E-05	2.4E-05	6.5E-06	3.6E-05	**9.4E-05**
					Total HAPs	**0.03**
					Worst HAP	**0.03**

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.

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 12, 2016

Mr. Sean Adley
Eckart America Corporation
650 West 67th Avenue, Suite 200
Schererville, IN 46375

Re: Public Notice
Eckart America Corporation
Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 089-37086-00565 and 089-37100-00565

Dear Mr. Adley:

Enclosed is a copy of your draft Title V Significant Source Modification and 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 Post Tribune in Merrillville, Indiana and The Times in Munster, Indiana publish the abbreviated version of the public notice no later than August 16, 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 Dyer-Schererville Branch of the Lake County Public Library, 1001 West Lincoln Highway in Schererville, 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 Madhurima Moulik, 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 3-0868 or dial (317) 233-0868.

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

August 11, 2016

The Post Tribune
1433 E. 83rd Avenue
Merrillville, IN 46410

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Eckart America Corporation, Lake County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 16, 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 Source Modification and Significant Permit Modification
Permit Number: 089-37086-00565 and 089-37100-00565

Enclosure
PN Newspaper.dot 8/27/2015

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 11, 2016

The Times
601 West 45th Avenue
Munster, IN 46321

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Eckart America Corporation, Lake County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 16, 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 Source Modification and Significant Permit Modification
Permit Number: 089-37086-00565 and 089-37100-00565

Enclosure
PN Newspaper.dot 8/27/2015

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 12, 2016

To: Dyer-Schererville Branch of the Lake 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: Eckart America Corporation
Permit Number: 089-37086-00565 and 089-37100-00565

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016

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Carol S. Comer
Commissioner

Notice of Public Comment

August 12, 2016
Eckart America Corporation
089-37086-00565 and 089-37100-00565

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016

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Governor

Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

August 12, 2016

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

Permit Number: **089-37086-00565 and 089-37100-00565**
Applicant Name: **Eckart America Corporation**
Location: **Schererville, Lake County, Indiana**

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

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

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

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

Affected States Notification.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VHAUN 8/12/2016 Eckart America Corporation 089-37086 and 37100-00565 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Sean Adley Eckart America Corporation 650 W 67th Ave, Ste 200 Schererville IN 46375 (Source CAATS)									
2		Joseph Perdue Head of Operations Eckart America Corporation 650 W 67th Ave, Ste 200 Schererville IN 46375 *(RO CAATS)*									
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 *(Local Official)*									
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 *(Health Department)*									
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 *(Affected Party)*									
6		Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 *(Local Official)*									
7		Schererville Town Council and Town Manager 10 E Joliet Street Schererville IN 46375 *(Local Official)*									
8		Shawn Sobocinski 1814 Laporte Street Portage IN 46368-1217 *(Affected Party)*									
9		Mr. Dennis Hahney Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 *(Affected Party)*									
10		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 *(Affected Party)*									
11		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 *(Local Official)*									
12		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 *(Affected Party)*									
13		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)									
14		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 *(Affected Party)*									
15		Holly Argiris Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd, Suite 560-W Indianapolis IN 46240 *(Consultant)*									

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 ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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FACSIMILIE OF PS Form 3877

Mail Code 61-53

IDEM Staff	VHAUN 8/12/2016 Eckart America Corporation 089-37086 and 37100-00565 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)									
2		Lake County Public Library 1001 West Lincoln Highway Schererville IN 46375 *(Library)*									
3		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 *(Affected Party)*									
4		Gary City Council 401 Broadway # 209 Gary IN 46402 *(Local Official)*									
5		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 *(Affected Party)*									
6		Ryan Dave 939 Cornwallis Munster IN 46321 *(Affected Party)*									
7		Mark Coleman PO Box 85 Beverly Shores IN 46301-0085 *(Affected Party)*									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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