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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Daramic, LLC in Harrison County
SPM No. 061-38511-00012

The Indiana Department of Environmental Management (IDEM) has received an application from Daramic, LLC located at 3430 Cline Road NW, Corydon, Indiana 47112 for a significant permit modification to its Part 70 Operating Permit No. 061-31760-00012, issued on July 10, 2014. The change involves the addition of one (1) Solvent Concentrator System and one (1) Carbon Adsorber System that will control existing emission units.

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

Corydon Public Library
117 West Beaver Street
Corydon, Indiana 47112
and
IDEM Southeast Regional Office
820 Sweet Street
Brownstown, Indiana 47220

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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 SPM No. 061-38511-00012 in all correspondence.

Comments should be sent to:

Aida DeGuzman
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension (3-4972)
Or dial directly: (317) 233-4972
Fax: (317) 232-6749 attn: Aida DeGuzman
E-mail: adeguzma@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 Aida DeGuzman of my staff at the above address.

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

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Eric J. Holcomb
Governor

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Commissioner

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Ms. Maggie Fox
Daramic, LLC
3430 Cline Road NW
Corydon, IN 47112-6908

Re: 061-38511-00012
Significant Permit Modification

Dear Ms. Fox:

Daramic, LLC was issued Part 70 Operating Permit No. T061-31760-00012 on July 10, 2014 for a stationary battery separator manufacturing plant located at 3430 Cline Road, Corydon, IN 47112-6908. An application to add one (1) Solvent Concentrator System and one (1) Carbon Adsorber System that will control existing emission units was received on May 3, 2017. Pursuant to the provisions of 326 IAC 2-7-12(d)(1), a Significant Permit Modification is hereby approved as detailed in the attached Technical Support Document.

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

ATTACHMENT A - 40 CFR 63, Subpart EEEE - National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)

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

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

ATTACHMENT D - 40 CFR 60, Subpart IIII - New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines

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

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

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

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

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If you have any questions on this matter, please contact Aida DeGuzman, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-4972 or 1-800-451-6027, and ask for (317) 233-4972.

Sincerely,

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

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

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Daramic, LLC
3430 Cline Road NW
Corydon, Indiana 47112

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

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

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

Operation Permit No.: T061-31760-00012 Master Agency Interest ID.: 11725	
Issued by/Original Signed by: Chrystal A. Wagner, Section Chief Permits Branch,Office of Air Quality	Issuance Date: July 10, 2014 Expiration Date: July 10, 2019

Minor Permit Modification No.: 061-35452-00012, issued on April 22, 2015
Significant Permit Modification No.: 061-35655-00012, issued on July 09, 2015
Administrative Amendment No.: 061-37313-00012, issued on July 15, 2016

Significant Permit Modification No.: 061-38511-00012	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: July 10, 2019

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	3430 Cline Road NW, Corydon, Indiana 47112
General Source Phone Number:	(812) 738-0422
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
County Location:	Harrison County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act Not 1 of 28 source categories

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

This stationary source consists of the following emission units and pollution control devices used in the production of plastic battery separators at a maximum production rate of 100 million square meters per year (Mm2/yr):

(a) Sub-Micro (SM) Line 3, installed in 1979, and Sub-Micro (SM) Line 4, installed in 1984, consisting of the following equipment:

(1) Four (4) silos, identified as Unit ID #s 4.1-4.4, used to store either polyethylene or silica, with a maximum storage capacity of 168, 168, 75, and 75 tons, respectively, and maximum throughput rate of 10, 10, 7.5, 7.5 tons per hour, respectively, utilizing a bin filter (Unit ID #s 4.1-4.4) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 4, 5, 6, and 7, respectively;

(2) Two (2) day bins, identified as Unit ID #s 6.1 and 6.2, used to store silica and polyethylene, respectively, with a maximum storage capacity of 2.4 and 0.125 tons, respectively, each utilizing a bin filter (Unit ID #s 6.1 and 6.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 10 and 11, respectively;

(3) One (1) silo dilute phase transporter, identified as Unit ID #3.1, constructed in 2008, used to convey silica from rail cars to silo #s 4.2-4.5, with a maximum throughput rate of 5.25 tons per hour, utilizing a baghouse (Unit ID # 3.1) for particulate control, exhausting through one (1) stack, identified as S/V ID #3;

(4) One (1) silica transporter, identified as Unit ID # 5.1, constructed in 1979, used to convey silica from silos 4.3, 4.4, and 4.5 to silica day bin # 6.1, utilizing a baghouse (Unit # 5.1) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID # 9;

(5) Two (2) oil extraction systems, identified as Unit ID #s 9.1 and 9.2, each system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing a carbon adsorber system (CAS1 or CAS2) to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 17;

(6) One (1) extruder, identified as Unit ID #8.1, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #14

(7) One (1) extruder, identified as Unit ID #8.2, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #16;

(8) Two (2) aerosol addition systems (mix towers), identified as Unit ID #s 10.1, 10.2, exhausting inside the building;

(b) Sub-Micro (SM) Line 6, installed in 1991, consisting of the following equipment:

(1) One (1) silo, identified as Unit ID # 4.5, used to store silica, with a maximum storage capacity of 75 tons, with a maximum throughput rate of 7.5 tons per hour, utilizing a bin filter (Unit ID # 4.5) for particulate matter control, exhausting through one (1) stack, identified as S/V ID # 8;

(2) Two (2) day bins, identified as Unit ID #s 7.1 and 7.2, used to store silica and polyethylene, respectively, each with a maximum storage capacity of 2.4 and 0.125 tons, respectively, and maximum throughput rate of 800.32 pounds per hour and 307.65 pounds per hour, respectively, each utilizing a bin filter (Unit ID #s 7.1 and 7.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 12 and 13, respectively;

(3) One (1) oil extraction system, identified as Unit ID # 9.3, system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing a carbon adsorber system (CAS1 or CAS2) to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 18;

(4) One (1) extruder, identified as Unit ID # 8.3, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #16

(5) One (1) aerosol addition system (mix tower), identified as Unit ID # 10.3, exhausting inside the building;

(c) Sub-Micro (SM) Lines 3, 4 and 6 support equipment, consisting of storage tanks (Unit ID #s 11.1 through 11.6) and a trichloroethylene (TCE) recovery system (smokehouse) Unit ID #9.4.

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

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

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

(f) One (1) tank, identified as Unit # 11.7, constructed in 1991, used to store virgin oil, with a maximum storage capacity of 14,384 gallons;

(g) One (1) silo dilute phase transporter, identified as Unit ID #13, installed in 2000, used to convey polyethylene pneumatically from rail cars to a silo, with a maximum throughput rate of 10 tons per hour, utilizing a bin filter for particulate control and exhausting through one (1) stack, identified as S/V ID #20;

(h) One (1) polyethylene day bin line 3 with maximum throughput rate of 226.47 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F05.1;

(i) One (1) silica day bin line 3 with maximum throughput rate of 588.96 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F01.1;

(j) One (1) polyethylene day bin line 4 with maximum throughput rate of 241.99 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F05.2; and

(k) One (1) silica day bin line 4 with maximum throughput rate of 629.34 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F01.2.

(l) One (1) Solvent Concentrator System (SCS) and one (1) Carbon Adsorber System, identified as CAS2, exhausting to stack S/V 18, approved in 2018 for construction.

During normal operation after the startup of CAS2, the CAS2 will control VOC emissions from the oil extraction system for Sub-Micro (SM) Line 6, three (3) storage tanks, ID #s 11.4 through 11.6 that support Sub-Micro Line 6 and the concentrated exhaust from the SCS during normal operations. The CAS2 may also control VOC emissions from the oil extraction systems for Sub-Micro (SM) Line 3 and Sub-Micro (SM) Line 4, three (3) storage tanks, ID #s 11.1 through 11.3 that support SM Line 3 and SM Line 4 and the trichloroethylene recovery system (Unit # 9.4) during maintenance, shutdown or failure of CAS1.

The SCS will be utilized to concentrate VOC leak emissions from oil extraction equipment located within the Sub-Micro Line 3 and Sub-Micro Line 4 oil extraction room; which includes leaks from equipment in liquid, vapor and vacuum trichloroethylene services.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour:

(1) Natural gas-fired space heaters.

(b) Propane or liquefied petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(1) Propane and oil surge tanks.

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

(d) Wastewater treatment system.

(e) Forced and induced draft cooling tower system not regulated under a NESHAP, reusing treated wastewater and tap water as make-up water.

(f) Replacement or repair of filters in air filtration equipment.

(g) Heat exchanger cleaning and repair.

(h) Trimmers that do not produce fugitive emissions and that are equipped with a dust collector or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2].

(i) Paved and unpaved roads with public access [326 IAC 6-4].

(j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(k) Blowdown for the following: compressor, pumps and cooling tower.

(l) On-site fire and emergency response training approved by the department.

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

(n) Filter or coalesce media changeout.

(o) A laboratory as defined by 326 IAC 2-7-1(21)(H).

(p) Other activities or categories with VOC emissions less than the insignificant thresholds, not previously identified:
(1) SM Line 3 mixing tower, SM Line 4 mixing tower
(2) SM Line 6 mixing tower;

(q) One (1) Chop Line: The line utilizes separator material made by the Corydon plant and purchased fiberglass in roll form. The 50-inch wide fiberglass is applied in roll form onto the separator material. Glue is used as an adhesive to bond the fiberglass to the separator material. The roll is heated in an electrically powered oven. The sheet exits the oven to a conveyor belt where it is cut into customer-required dimensions. An exhaust blower is used as a ventilation system directing fiberglass particles to a cyclone and collection bin and venting inside the building. The fiberglass is disposed as plant waste to a local landfill. Based on maximum usage of glue, the potential to emit VOC is less than 100 pounds per year [326 IAC 6-3-2].

(r) Defect marking operation.

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

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

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

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

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SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T061-31760-00012, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southeast 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
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058**.**

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T061-31760-00012 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.6 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.

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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:

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

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

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

(c) 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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

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

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

C.13 Response to Excursions or Exceedances [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

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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]

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

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

The statement must be submitted to:

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

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

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

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

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

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

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

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

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

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

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(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

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

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

(b) The address for report submittal is:

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

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.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.

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SECTION D.1 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

(a) Sub-Micro (SM) Line 3, installed in 1979, and Sub-Micro (SM) Line 4, installed in 1984, consisting of the following equipment:

(5) Two (2) oil extraction systems, identified as Unit ID #s 9.1 and 9.2, each system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing a carbon adsorber system (CAS1 or CAS2) to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 17;

(6) One (1) extruder, identified as Unit ID #8.1, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #14;

(7) One (1) extruder, identified as Unit ID #8.2, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #16;

(8) Two (2) aerosol addition systems (mix towers), identified as Unit ID #s 10.1, 10.2, exhausting inside the building;

(b) Sub-Micro (SM) Line 6, installed in 1991, consisting of the following equipment:

(3) One (1) oil extraction system, identified as Unit ID # 9.3, system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing carbon adsorber system (CAS1 or CAS2) to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 18;

(4) One (1) extruder, identified as Unit ID # 8.3, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #16;

(5) One (1) aerosol addition system (mix tower), identified as Unit ID # 10.3, exhausting inside the building;

(c) Sub-Micro (SM) Lines 3, 4 and 6 support equipment, consisting of storage tanks (Unit ID #s 11.1 through 11.6) and a trichloroethylene (TCE) recovery system (smokehouse) Unit ID # 9.4.

(l) One (1) Solvent Concentrator System (SCS) and one (1) Carbon Adsorber System, identified as CAS2, exhausting to stack S/V 18, approved in 2018 for construction.

During normal operation after the startup of CAS2, the CAS2 will control VOC emissions from the oil extraction system for Sub-Micro (SM) Line 6, three (3) storage tanks, ID #s 11.4 through 11.6 that support Sub-Micro Line 6 and the concentrated exhaust from the SCS during normal operations. The CAS2 may also control VOC emissions from the oil extraction systems for Sub-Micro (SM) Line 3 and Sub-Micro (SM) Line 4, three (3) storage tanks, ID #s 11.1 through 11.3 that support SM Line 3 and SM Line 4 and the trichloroethylene recovery system (smokehouse Unit # 9.4) during maintenance, shutdown or failure of CAS1.

The SCS will be utilized to concentrate VOC leak emissions from oil extraction equipment located within the Sub-Micro Line 3 and Sub-Micro Line 4 oil extraction room; which includes

leaks from equipment in liquid, vapor and vacuum trichloroethylene services.

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

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

D.1.1 Volatile Organic Compounds BACT Limits [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the Permittee shall comply with the following BACT requirements when CAS1 is the only control operating:

(1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, Sub-Micro (SM) Line 4 and Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4), except leak emissions from equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service, shall be controlled by a Carbon Adsorption System (CAS) with an overall control efficiency of no less than 96%.

(2) The VOC emissions from the CAS stack (S/V ID # 17) shall not exceed 46.2 pounds per hour.

(3) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.

(4) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse, Unit ID # 9.4) when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the CAS1 but the control efficiency of 96% shall not apply due to the expected low VOC inlet concentration.

(5) The control efficiency of 96% shall not apply when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID #11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.

(6) During maintenance, failure or shutdown of CAS2, CAS1 may receive emissions from the oil extraction systems for SM Lines 3, 4, 6, storage tanks (Unit ID#11.1 through 11.6), the trichloroethylene recovery system (smokehouse, Unit ID# 9.4), and the concentrated exhaust from the SCS as long as CAS1 maintains an overall control efficiency of no less than 96%.

(b) Pursuant to 326 IAC 8-1-6, (New Facilities: General Reduction Requirements), upon the initial startup of the SCS and CAS2, the Permittee shall comply with the following BACT requirements, when CAS 1 and CAS2 are both operating:

(1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, and Sub-Micro (SM) Line 4, and related support equipment consisting of storage tanks (Unit ID#11.1 through 11.3) and the trichloroethylene recovery system (smokehouse, Unit ID# 9.4), shall be controlled by CAS1 with an overall control efficiency of no less than 96%.

(2) The VOC emissions during operation of the oil extraction system for Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.4 through 11.6), except leak emissions from equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service, and the VOC emissions in the concentrated exhaust from the SCS shall be controlled by CAS2 with an overall control efficiency of no less than 96%.

(3) The total VOC emissions from the CAS1 stack (S/V ID # 17) and CAS2 stack (S/V #18) shall not exceed 46.2 pounds per hour.

(4) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.

(5) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse, Unit ID # 9.4) and the VOC emissions from the concentrated exhaust from the SCS when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the Carbon Adsorption System but the control efficiency of 96% shall not apply due to the expected low VOC inlet concentration.

(6) The control efficiency of 96% shall not apply to CAS1 or CAS2 when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID# 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.

(c) Pursuant to 326 IAC 8-1-6, (New Facilities: General Reduction Requirements), upon the initial startup of the SCS and CAS2, the Permittee shall comply with the following BACT requirements, when CAS2 is used as the only VOC control:

(1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, Sub-Micro (SM) Line 4 and Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse Unit # 9.4), except leak emissions from SM Line 6 equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service, and the VOC emissions in the concentrated exhaust from the SCS shall be controlled by CAS2 with an overall control efficiency of no less than 96%.

(2) The VOC emissions from the CAS2 stack (S/V #18) shall not exceed 46.2 pounds per hour.

(3) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.

(4) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse, Unit ID # 9.4) and the VOC emissions in the concentrated exhaust from the SCS when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the CAS2 but the control efficiency of 96% shall not apply due to the expected low

VOC inlet concentration.

(5) The control efficiency of 96% from CAS2 shall not apply when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID #11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.

(d) The implementation of a leak detection and repair (LDAR) program for equipment leaks as follows:

(1) The Permittee shall develop a written LDAR program requiring leak checks of all equipment in trichloroethylene service.

(2) The LDAR program shall include the following elements:

(A) Written LDAR program - The written LDAR program shall specify the source's specific procedure for recordkeeping, certifications, monitoring and repair

(B) Training - The training programs can vary according to the level of involvement and degree of responsibility of LDAR personnel.

(C) LDAR audits - The audits shall check that the correct equipment is being monitored, LDAR program procedures are being followed, leaks are being fixed and the required records are being kept.

(D) Contractor accountability - The LDAR program shall describe oversight procedures to increase the accountability of contractors.

(E) Internal leak definition - The LDAR program shall include the internal leak definition applicable to equipment in TCE service

(F) More frequent monitoring - To ensure that leaks are still being identified in a timely manner and that previously unidentified leaks are not worsening over time, implement a plan for more frequent monitoring for components that contribute most to equipment leak emissions.

(G) First attempt at repair - Time frames and practices must be established for first attempt at repairing components to stop detected leaks while still small.

(H) Delay of repair compliance assurance - Any component that cannot be repaired during the specified repair interval must be placed on a “Delay of Repair” list to be repaired during the next shutdown cycle. Delay of repair compliance assurance procedures are to be included to ensure that the appropriate equipment is justifiably on the “Delay of Repair” list.

(I) Electronic monitoring and storage of data - Maintenance of an electronic database for storing and reporting LDAR data and use of data loggers or other data collection devices during all LDAR monitoring.

(J) QA/QC of LDAR data - A procedure to ensure QA/QC review of all data generated by LDAR monitoring.

(K) Calibration drift assessment - Calibration of LDAR monitoring equipment using an appropriate calibration gas, in accordance with 40 CFR Part 60,

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EPA Reference Test Method 21.

(L) Records of maintenance - Records must be maintained for the LDAR program in accordance with Section C - General Record Keeping Requirements.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.3 Operation of VOC Controls

(a) Prior to the initial startup of the SCS and CAS2, CAS1 shall be in operation at all times and control emissions from the oil extraction systems for SM Lines 3, 4 and 6, storage tanks (ID#s 11.1 through 11.6), and the trichloroethylene recovery system (smokehouse, Unit ID# 9.4), except leak emissions from equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service. Equipment means each pump, compressor, agitator, pressure relief device, sampling connection system, open ended valve or line, valve connector, surge control vessel, bottom receiver and instrumentation system in trichloroethylene service.

(b) After the initial startup of the SCS and CAS2, CAS1 and/or CAS2 shall be in operation at all times and control emissions from the oil extraction systems for SM Lines 3, 4 and 6, storage tanks IDs (ID#s 11.1 through 11.6) the trichloroethylene recovery system (smokehouse, Unit ID# 9.4) and the concentrated exhaust from the SCS, except leak emissions from SM Line 6 equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service. Equipment means each pump, compressor, agitator, pressure relief device, sampling connection system, open ended valve or line, valve connector, surge control vessel, bottom receiver and instrumentation system in trichloroethylene service.

(c) Upon the initial startup of SCS, the SCS shall be in operation at all times and used to concentrate trichloroethylene laden ambient air, except trichloroethylene escaping through open doorways, that is removed from the room containing the oil extraction system for SM Line 3 and SM Line 4 and the concentrated SCS exhaust routed to CAS1 or CAS2 whenever the oil extraction system for SM Line 3 or SM Line 4 is operating. Doors to this room must remain closed at all times except during necessary access purposes.

(d) When the oil extraction systems for SM Lines 3, 4 and 6 are in operation, one (1) of the two (2) carbon beds in each CAS that is operating shall be regenerated at least once every ninety (90) minutes, while one (1) carbon bed in the CAS is operating.

(e) CAS2 must be designed to accommodate CAS2 inlet trichloroethylene concentration of at least 10,000 ppmv given a CAS2 inlet air flow rate of at least 5,600 scfm.

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

(a) Not later than 180 days after the initial startup of the new Solvent Concentrator System (SCS) and the new Carbon Adsorber System (CAS2) when controlling the oil extraction systems for the existing Sub-Micro Line 3, Sub-Micro Line 4, and Sub-Micro Line 6, the related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse, Unit ID # 9.4) and the concentrated exhaust from the SCS, the Permittee shall perform VOC testing of CAS2 to verify compliance with Condition D.1.1(c)(1) and (2), utilizing methods approved by the

Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(b) Not later than 180 days after both the initial startup of CAS1 when controlling the oil extraction systems for Sub-Micro Line 3, and Sub-Micro Line 4 and related support equipment consisting of storage tanks (Unit ID#s 11.1 through 11.3) and the trichloroethylene recovery system (smokehouse, Unit ID# 9.4) and the initial startup of CAS2 when controlling the existing Sub-Micro Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.4 through 11.6) and the concentrated SCS exhaust, the Permittee shall perform a combined VOC testing of CAS1 and CAS2 to verify compliance with Condition D.1.1(b)(1), (2) and (3), utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(c) Within five (5) years from the most recent compliance stack test, the Permittee shall perform VOC testing of the carbon adsorption system (CAS1), when operating alone to demonstrate compliance with Condition D.1.1(a)(1) and (2), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

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

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

(a) The Permittee shall certify and maintain a continuous VOC monitoring system for each CAS1 and CAS2.

(b) The Permittee must install, certify and maintain a continuous VOC monitoring system for CAS2 within sixty (60) days after initial startup of CAS2. This monitoring system must be calibrated and operated to measure the VOC control efficiency of CAS2 and shall be in operation at all times that any of the oil extraction systems for SM Lines 3, 4 or 6 are in operation and any of their respective emissions are routed to CAS2. Permittee shall develop a QA/QC Plan in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 3.

(c) The continuous VOC monitoring systems shall be calibrated and operated to measure the control efficiency of the carbon adsorber systems (CAS) serving oil extraction systems for SM-3, SM-4 and SM-6. The continuous VOC monitoring system shall be in operation at all times the oil extraction systems for any one of Lines SM-3, SM-4 or SM-6 are in operation, except during periods the monitoring system is undergoing quality assurance/quality control checks, repairs, replacement or maintenance or is malfunctioning. "Continuous" shall mean the collection of at least one measurement of CAS inlet and CAS outlet VOC concentrations for each 15-minute block period. Compliance is indicated if the 24-hour average CAS control efficiency is no less than 96%.

(d) Relative Accuracy Test Audits (RATAs) must be performed on the monitoring systems no less than once every 5 years.

(e) Zero and Span calibrations shall be performed no less frequently than once per week. According to the procedures of 40 CFR Part 60 Appendix F Section 4.0, any reading in excess of 2.5% of span would require immediate corrective action, to eliminate the problem. Any reading greater than 10% of span would be considered out of control and would require immediate corrective action. An initial attempt at corrective action must be taken within four (4) hours of the failed calibration. If a successful calibration is not completed within two (2) days, the Permittee must follow the monitoring procedure in Condition D.1.5(h) with a properly calibrated analyzer.

(f) The Permittee shall respond to monitor out of control periods as defined in 40 CFR Part 60, Appendix F, Section 4.3.1.

(g) Quarterly Cylinder Gas Audits shall be performed in any quarter where a RATA is not conducted.

(h) If the continuous VOC monitoring system is down for more than 5 days, the Permittee shall take daily instantaneous measurements of the outlet VOC concentration of the CAS (using a handheld flame ionization detector, photo-ionization detector or comparable device) and at the same time record the value of the CAS exhaust gas flow rate. Provided the CAS exhaust gas flow rate is less than or equal to 5,652 standard cubic feet per minute (scfm), compliance is indicated if the CAS outlet VOC concentration is less than 400 ppmv , and no measurement of the CAS inlet VOC concentration or calculation of CAS efficiency is required for that day. If the outlet CAS VOC concentration is greater than 400 ppmv, then a daily grab measurement of the CAS inlet VOC concentration (using a colorimetric tube analysis) shall also be taken and the CAS control efficiency calculated to provide an indication of compliance. CAS control efficiency shall be calculated using the VOC concentration data as follows:

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

Daily measurements of CAS exhaust gas flow rate and VOC inlet and outlet concentrations shall be taken within the final 30 minutes of a carbon bed cycle and shall be taken when the CAS cooling air blower is not operating. The CAS cooling air blower is not operating when the measured CAS exhaust gas flow rate is less than or equal to 5,652 scfm. In the event that the outlet VOC concentration is greater than 400 ppmv and the CAS efficiency is less than 96%, the Permittee shall perform reasonable response steps to achieve 96% CAS efficiency including the requirements of Condition D.1.6 in the event of a failure of the CAS. During continuous VOC monitoring system downtime, the Permittee shall continue to make daily CAS efficiency calculations until a CAS efficiency of 96% or more is achieved for seven (7) consecutive operating days. Upon achieving a daily CAS efficiency of 96% or more for seven (7) consecutive operating days, the Permittee may resume daily measurement of the outlet VOC concentration during continuous VOC monitoring system downtime.

(i) Under no circumstances should CAS2 take on an air flow or concentration beyond the maximum air flow or trichloroethylene concentration specified by the manufacturer. An air flow or concentration beyond the manufacturer specifications is not a deviation of this permit as long as the CAS operates in compliance with the control efficiency requirement.

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

In the event that carbon adsorber failure has been observed:

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Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1(a)(1), (2) or D.1.1(b)(1), (2), (3) or D.1.(c)(1), (2) based on which CAS is operating and D.1.5, the Permittee shall maintain records in accordance with (1) through (6). Records of all data and operating parameters shall be complete and sufficient to establish compliance with the limits established in Condition D.1.1(a)(1), (2) or D.1.1(b)(1), (2), (3) or D.1.(c)(1), (2) based on which CAS is operating and the monitoring conditions established in Condition D.1.5.

(1) Permittee shall maintain records of the readings of the continuous VOC monitoring system.

(2) All corrective and preventive actions taken.

(3) All maintenance logs, calibration checks, and other required quality assurance activities.

(4) A log of plant operations, including emission unit or monitoring system downtime with the following information:

(A) Date of emissions unit or monitoring system downtime.
(B) Time of commencement and completion of each downtime.
(C) Reason for each downtime.
(D) Nature of system repairs and adjustments

(5) Records of carbon bed desorptions/regenerations which shall include date and time of desorption.

(6) Records of once daily vapor leak checks of the vapor collection system downstream of the solvent-laden air (SLA) blower for each CAS and response steps taken if any. A leak is defined as greater than or equal to 10,000 ppmv, as methane.

(b) To document the compliance status with Condition D.1.1(d), the Permittee shall maintain the records required by the written LDAR program.

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

D.1.8 Reporting Requirements

A semi-annual report shall be submitted no later than thirty (30) days after the end of the semi-annual period being reported. The report shall contain a monthly summary of the readings from the continuous VOC monitoring system to document the compliance status with Conditions D.1.1(a)(1), (2) or D.1.1(b)(1), (2), (3) or D.1.(c)(1),(2) based on which CAS is operating and D.1.5. The report shall include the following information:

(1) 24-hour average or daily average CAS control efficiency readings less than 96% and date of such readings.

(2) Continuous VOC monitoring system instrument downtime, except for zero (0) and span checks, shall include the following:

(A) Date of downtime.
(B) Time of commencement.
(C) Duration of each downtime.
(D) Reasons for each downtime.
(E) Nature of system repairs and adjustments.

(3) A notation and a reason for a lack of readings from the continuous VOC monitoring system (e.g., the process did not operate that day).

(4) If there are no excess emissions or continuous VOC monitoring instrument downtime in a reporting period, the Permittee shall submit a report indicating that no excess emissions or downtime incidents occurred in the reporting period.

(5) The semi-annual report shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit.

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

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SECTION D.2 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(14)]

(a) Sub-Micro (SM) Line 3, installed in 1979, and Sub-Micro (SM) Line 4, installed in 1984, consisting of the following equipment:

(1) Four (4) silos, identified as Unit ID #s 4.1-4.4, used to store either polyethylene or silica, with a maximum storage capacity of 168, 168, 75, and 75 tons, respectively, and maximum throughput rate of 10, 10, 7.5, 7.5 tons per hour, respectively, utilizing a bin filter (Unit ID #s 4.1-4.4) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 4, 5, 6, and 7, respectively;

(2) Two (2) day bins, identified as Unit ID #s 6.1 and 6.2, used to store silica and polyethylene, respectively, with a maximum storage capacity of 2.4 and 0.125 tons, respectively, each utilizing a bin filter (Unit ID #s 6.1 and 6.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 10 and 11, respectively;

(3) One (1) silo dilute phase transporter, identified as Unit ID #3.1, constructed in 2008, used to convey silica from rail cars to silo #s 4.2-4.5, with a maximum throughput rate of 5.25 tons per hour utilizing a baghouse (Unit ID # 3.1) for particulate control, exhausting through one (1) stack, identified as S/V ID # 3;

(4) One (1) silica transporter, identified as Unit ID # 5.1, constructed in 1979, used to convey silica from silos 4.3, 4.4, and 4.5 to silica day bin #s 6.1 and 6.2, utilizing a baghouse (Unit # 5.1) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID # 9;

(b) Sub-Micro (SM) Line 6, installed in 1991, consists of the following equipment:

(1) One (1) silo, identified as Unit ID # 4.5, used to store silica, with a maximum storage capacity of 75 tons, with a maximum throughput rate of 7.5 tons per hour, utilizing a bin filter (Unit ID # 4.5) for particulate matter control, exhausting through one (1) stack, identified as S/V ID # 8;

(2) Two (2) day bins, identified as Unit ID #s 7.1 and 7.2, used to store silica and polyethylene, respectively, with a maximum storage capacity of 2.4 and 0.125 tons, respectively, and maximum throughput rate of 800.32 and 307.65 pounds per hour, respectively, each utilizing a bin filter (Unit ID #s 7.1 and 7.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 12 and 13, respectively.

(g) One (1) silo dilute phase transporter, identified as Unit ID #13, installed in 2000, used to convey polyethylene pneumatically from rail cars to a silo, with a maximum throughput rate of 10 tons per hour, utilizing a bin filter for particulate control and exhausting through one (1) stack, identified as S/V ID #20.

(h) One (1) polyethylene day bin line 3 with maximum throughput rate of 226.47 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F05.1;

(i) One (1) silica day bin line 3 with maximum throughput rate of 588.96 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F01.1;

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(j) One (1) polyethylene day bin line 4 with maximum throughput rate of 241.99 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F05.2; and

(k) One (1) silica day bin line 4 with maximum throughput rate of 629.34 pounds per hour, installed in 2004, equipped with a baghouse for particulate control and exhausting through one (1) stack identified as F01.2.

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

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

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

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

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

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

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

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

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

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

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

D.2.3 Particulate Control

(a) The bin filters for the five (5) silos (ID #s 4.1 - 4.5) and four (4) day bins (ID #s 6.1, 6.2, 7.1 and 7.2), the baghouses for the three (3) transporters (Unit ID #s 3.1, 5.1 and 13), and the baghouses for the polyethylene and silica weigh bin lines 3 and 4 (F05.1, F01.1, F05.2 and F01.2), for particulate control shall be in operation at all times when the units are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Visible Emissions Notations

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

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.5 Parametric Monitoring

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

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

D.2.6 Broken or Failed Bag Detection

(a) For a single compartment baghouse or bin filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.2.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the five (5) silos, four (4) day bins, three (3) transporters and polyethelene and silica weigh bin lines 3 and 4 (F05.1, F01.1, F05.2 and F01.2) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).

(b) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

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

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SECTION D.3 FACILITY OPERATION CONDITIONS

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

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

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

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

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

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

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

D.3.2 Visible Emissions Notations

(a) Daily visible emission notations of the boiler (Unit ID # 1.1) stack exhaust shall be performed during normal daylight operations when burning No. 2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.3.3 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.2, the Permittee shall maintain records of daily visible emission notations of the boiler (Unit ID # 1.1) stack exhaust when burning No. 2 fuel oil. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).

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

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SECTION D.4 FACILITY OPERATION CONDITIONS

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

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

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

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

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

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

This limitation is based on the following equation:

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

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.

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

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

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SECTION D.5 FACILITY OPERATION CONDITIONS

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

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

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(1) Equip the degreaser with a cover.
(2) Equip the degreaser with a device for draining cleaned parts.
(3) Close the degreaser cover whenever parts are not being handled in the degreaser.
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
(6) Store waste solvent only in closed containers.
(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
(3) If used, solvent spray:

(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

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D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers), the Permittee shall not operate the cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.5.3 Record Keeping Requirements

To document the compliance status with Condition D.5.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

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

(c) The type of solvent purchased.

(d) The total volume of the solvent purchased.

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

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

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SECTION E.1 FACILITY OPERATION CONDITIONS

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

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

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

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

National Emission Standards for Hazardous Air Pollutants (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 units 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline) NESHAP Subpart EEEE Requirements NSPS [326 IAC 12][40 CFR Part 63, Subpart EEEE]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart EEEE (included as Attachment A to the operating permit), for the emission units listed above:

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

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E.1.3 One Time Deadlines Relating to NESHAP EEEE

(a) The Permittee submitted Initial Notification on November 9, 2006 [40 CFR 63.2382(b)].

(b) The Permittee shall conduct initial compliance demonstrations no later than February 3, 2007 [40 CFR 63.2342].

(c) The Permittee shall submit first Semi-annual Compliance Report no later than July 31, 2007 [40 CFR 63.2386(b)(1)(ii)].

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SECTION E.2 FACILITY OPERATION CONDITIONS

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

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

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

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 units listed above, except as otherwise specified in 40 CFR Part 63, Subpart DDDDD.

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

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

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDD (included as Attachment B to the operating permit), for Boiler Unit ID #1.1:

(1) 40 CFR 63.7480
(2) 40 CFR 63.7485
(3) 40 CFR 63.7490(d)
(4) 40 CFR 63.7491
(5) 40 CFR 63.7495(b)
(6) 40 CFR 63.7499
(7) 40 CFR 63.7500(a)(1), (e), (f)
(8) 40 CFR 63.7501
(9) 40 CFR 63.7505(a)
(10) 40 CFR 63.7510(e)
(11) 40 CFR 63.7515(d)
(12) 40 CFR 63.7540(a)(10), (13), (d)
(13) 40 CFR 63.7545(a), (b), (f)
(14) 40 CFR 63.7550(a), (b), (c)(1), (c)(5)(i) through (iv), (xiv) and (xvii)
(15) 40 CFR 63.7555(a), (h)
(16) 40 CFR 63.7560

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(17) 40 CFR 63.7565
(18) 40 CFR 63.7570
(19) 40 CFR 63.7575,
Table 3 to Subpart DDDDD of Part 63 (sections 3, 4)
Table 9 to Subpart DDDDD of Part 63 (section 1.a.)
Table 10 to Subpart DDDDD of Part 63

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDD (included as Attachment B to the operating permit), for Boiler Unit ID #2.1-2:

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

SECTION E.3 FACILITY OPERATION CONDITIONS

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

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

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

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

E.3.1 General Provisions Relating to New Source Performance Standards (NSPS) [326 IAC 12-1][40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit listed above, except as otherwise specified in 40 CFR Part 60, Subpart Dc.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.3.2 Small Industrial-Commercial-Institutional Steam Generating Units NSPS [326 IAC 12] [40 CFR Part 60, Subpart Dc]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Dc (included as Attachment C to the operating permit) which are incorporated by reference as 326 IAC 12-1 for the emission unit listed above:

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

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SECTION E.4 FACILITY OPERATION CONDITIONS

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

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

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

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

E.4.1 General Provisions Relating to New Source Performance Standards (NSPS) [326 IAC 12-1][40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 60, Subpart IIII.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.4.2 Stationary Compression Ignition Internal Combustion Engines NSPS [326 IAC 12] [40 CFR Part 60, Subpart IIII]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit listed above:

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

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SECTION E.5 FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

(1) 40 CFR § 63.6590(c)(6)

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

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

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:
Printed Name:
Title/Position:
Phone:
Date:

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

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

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

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

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

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

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

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

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_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:

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

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

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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Daramic, LLC**
Source Location:	**3430 Cline Road NW, Corydon, IN 47112**
County:	**Harrison**
SIC Code:	**3089 (Plastics Products, Not Elsewhere Classified)**
Operation Permit No.:	**T 061-31760-00012**
Operation Permit Issuance Date:	**July 10, 2014**
Significant Permit Modification No.:	**061-38511-00012**
Permit Reviewer:	**Aida DeGuzman**

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 061-31760-00012 on July 10, 2014. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Minor Source Modification	061-35365-00012	February 20, 2015
Minor Permit Modification	061-35452-00012	April 22, 2015
Significant Source Modification	061-35587-00012	June 18, 2015
Significant Permit Modification	061-35655-00012	July 9, 2015
Administrative Amendment	061-37313-00012	July 15, 2016

County Attainment Status

The source is located in Harrison County.

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

(a) 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. Harrison County has been designated as

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

(b) $PM_{2.5}$
Harrison 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
Harrison County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants (PM, PM10 and CO). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and 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.

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 Permit Modification								
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP***	**Combined HAPs**
Total for Source	14.23	5.60	5.30	3.20	28.19	319.89	17.72	262.87 (TCE)	263.28
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

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

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

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Daramic, LLC on May 3, 2017, relating to the construction of the following control devices:

One (1) Solvent Concentrator System (SCS) and one (1) Carbon Adsorber System, identified as CAS2.

The CAS2 will control VOC emissions from the oil extraction system for Sub-Micro (SM) Line 6, three (3) storage tanks, ID #s 11.4 through 11.6 that support Sub-Micro Line 6.

The SCS will be utilized to concentrate VOC leak emissions from oil extraction equipment located within the Sub-Micro Line 3 and Sub-Micro Line 4 oil extraction room; which includes leaks from equipment in liquid, vapor and vacuum trichloroethylene service.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

No additional emissions result from the proposed one (1) Solvent Concentrator System and one (1) Carbon Adsorber System.

Permit Level Determination –Part 70 Permit Modification

The proposed one (1) Solvent Concentrator System and one (1) Carbon Adsorber System will control existing emission units that are currently subject to the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements). The current BACT is the use of a carbon adsorber with control efficiency of no less than 96% and VOC emissions not to exceed 46.2 pounds per hour. This modification will not require BACT re-evaluation, see State Rule Applicability Determination under 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

(a) Approval to Operate

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 does not qualify as a Minor Permit Modification or as an Administrative Amendment.

Permit Level Determination – PSD

The project does not emit any pollutant.

Federal Rule Applicability Determination

(a) This permit modification will not affect the NSPS and NESHAPs applicability determinations already made for the source.

Compliance Assurance Monitoring (CAM):

(a) This permit modification will not affect the CAM applicability determinations already made for the existing emission units.

State Rule Applicability Determination

(a) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
This rule applies to new facilities (as of January 1, 1980) that have potential emissions of twenty-five (25) tons) or more per year, located anywhere in the state; and are not otherwise regulated by other provisions of this article; 326 IAC 20-48; or 326 IAC 20-56; shall reduce VOC emissions using best available control technology (BACT).

The BACT required originally in SSM 061-32841-00012, issued on July 10, 2014 was appealed (Cause No. 14-A-J-4738) and re-evaluated in SSM 061-35587-00012, issued on June 18, 2015. The BACT established both in these modifications SSM 061-32841-00012 and SSM 061-35587-00012 was for the following existing emission units:

(1) SM Line 4 installed in 1984,

(2) SM Line 6 installed in 1991, and

(3) Equipment and Component Leaks

Sub-Micro (SM) Line 3 was installed in 1979. Therefore, it was determined to be not subject to 326 IAC 8-1-6.

The extrusion process was likewise, determined to be not subject to 326 IAC 8-1-6 because the VOC potential emissions for each line, SM Line 4 and SM Line 6 is less than 25 tons per year.

In this permitting action SPM 061-38511-00012, the source is proposing to control SM Line 6 with an equivalent new Carbon Adsorber System, identified as CAS2. This change to SM Line #6 will not be subject to BACT re-evaluation since there is no physical modification being done to SM Line #6 that will result in VOC emissions increase.

Leak emissions from liquid, vapor and vacuum services inside the room where SM Line 3 and SM Line 4 are located will be concentrated by a Solvent Concentrator System (SCS) and then controlled by the new CAS2. It was determined in the original BACT evaluation for SSM 061-32841-00012 that the leak emissions to be cost prohibitive to control by an add-on control system. However, since CAS2 is being installed, the cost now to control these leaks is zero.

The BACT currently established is the following:

(1) Pursuant to 326 IAC 8-1-6, the Permittee shall comply with the following BACT requirements:

(A) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, Sub-Micro (SM) Line 4 and Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4) shall be controlled by a Carbon Adsorption System (CAS) with an overall control efficiency of no less than 96%.

(B) The VOC emissions from the CAS stack (S/V ID # 17) shall not exceed 46.2 pounds per hour.

(C) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.

(2) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4) when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the CAS but the control efficiency of 96% shall not apply due to the expected low VOC inlet concentration.

(3) The control efficiency of 96% shall not apply when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID #11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.

(4) The implementation of a leak detection and repair (LDAR) program for equipment leaks as follows:

(A) The Permittee shall develop a written LDAR program requiring leak checks of all equipment in trichloroethylene service.

(B) The LDAR program shall include the following elements:

(i) Written LDAR program - The written LDAR program shall specify the source's specific procedure for recordkeeping, certifications, monitoring and repair

(ii) Training - The training programs can vary according to the level of involvement and degree of responsibility of LDAR personnel.

(iii) LDAR audits - The audits shall check that the correct equipment is being monitored, LDAR program procedures are being followed, leaks are being fixed and the required records are being kept.

(iv) Contractor accountability - The LDAR program shall describe oversight procedures to increase the accountability of contractors.

(v) Internal leak definition - The LDAR program shall include the internal leak definition applicable to equipment in TCE service

(vi) More frequent monitoring - To ensure that leaks are still being identified in a timely manner and that previously unidentified leaks are not worsening over time, implement a plan for more frequent monitoring for components that contribute most to equipment leak emissions.

(vii) First attempt at repair - Time frames and practices must be established for first attempt at repairing components to stop detected leaks while still small.

(viii) Delay of repair compliance assurance - Any component that cannot be repaired during the specified repair interval must be placed on a “Delay of Repair” list to be repaired during the next shutdown cycle. Delay of repair compliance assurance procedures are to be included to ensure that the appropriate equipment is justifiably on the “Delay of Repair” list.

(ix) Electronic monitoring and storage of data - Maintenance of an electronic database for storing and reporting LDAR data and use of data loggers or other data collection devices during all LDAR monitoring.

(x) QA/QC of LDAR data - A procedure to ensure QA/QC review of all data generated by LDAR monitoring.

(xi) Calibration drift assessment - Calibration of LDAR monitoring equipment using an appropriate calibration gas, in accordance with 40 CFR Part 60, EPA Reference Test Method 21.

(xii) Records of maintenance - Records must be maintained for the LDAR program in accordance with Section C - General Record Keeping Requirements.

(b) All the other state rules already determined for the source, will not be affected by this permit modification.

Compliance Determination and Monitoring Requirements

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

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

(a) The Compliance Determination Requirements applicable to this proposed control devices are as follows:

Summary of Testing Requirements					
Emission Unit	**Control Device**	**Timeframe for Testing or Date of Last Valid Demonstration)**	**Pollutant**	**Frequency of Testing**	**Authority**
Existing Sub-Micro Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4)	New Carbon Adsorber System (CAS2)	Within 180 days from start-up	VOC/TCE	Every 5 years	326 IAC 8-1-6
Existing Sub-Micro (SM) Line 3, and Sub-Micro (SM) Line 4 Sub-Micro Line 6 and related support equipment	Existing CAS1 and New Carbon Adsorber System (CAS2) together	Within 180 days from the start-up of CAS2 if both CAS1 and CAS2 are operating			

Summary of Testing Requirements					
Emission Unit	**Control Device**	**Timeframe for Testing or Date of Last Valid Demonstration)**	**Pollutant**	**Frequency of Testing**	**Authority**
consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4)					

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

Control	**Parameter**	**Frequency**	**Range**	**Excursions and Exceedances**
New Carbon Adsorber System (CAS2)	VOC Emissions	Continuous	46.2 pounds per hour	Response Steps
	Flame ionization detector to measure the CAS inlet and outlet VOC concentration when VOC monitoring system is down for more than 5 days to calculate control efficiency	Daily	---	Response Steps
	Vapor leak checks of the vapor collection system downstream of the solvent-laden air (SLA)	Daily	---	Response Steps
	Recording of carbon bed desorptions/regenerations which shall include date of desorption and number of loads between desorptions	Once every 90 minutes	---	

These monitoring conditions are necessary because the new carbon adsorber system CAS2 for Sub-Micro SM-6 must operate similarly as the existing CAS to assure compliance with the requirements of 326 IAC 8-1-6.

Proposed Changes

The following changes listed below are due to the proposed permit modification. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(1) Incorporate the new Carbon Adsorber System, identified as CAS2 in Section A.2 and Section D.1.

SECTION A.2 Changes:

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

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

in the production of plastic battery separator at a maximum production rate of 100 million square meters per year (Mm2/yr):

(a) Sub-Micro (SM) Line 3, installed in 1979, and Sub-Micro (SM) Line 4, installed in 1984, consisting of the following equipment:

(1) Four (4) silos, identified as Unit ID #s 4.1-4.4, used to store either polyethylene or silica, with a maximum storage capacity of 168, 168, 75, and 75 tons, respectively, and maximum throughput rate of 10, 10, 7.5, 7.5 tons per hour, respectively, utilizing a bin filter (Unit ID #s 4.1-4.4) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 4, 5, 6, and 7, respectively;

(2) Two (2) day bins, identified as Unit ID #s 6.1 and 6.2, used to store silica and polyethylene, respectively, with a maximum storage capacity of 2.4 and 0.125 tons, respectively, each utilizing a bin filter (Unit ID #s 6.1 and 6.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 10 and 11, respectively;

(3) One (1) silo dilute phase transporter, identified as Unit ID #3.1, constructed in 2008, used to convey silica from rail cars to silo #s 4.2-4.5, with a maximum throughput rate of 5.25 tons per hour, utilizing a baghouse (Unit ID # 3.1) for particulate control, exhausting through one (1) stack, identified as S/V ID #3;

(4) One (1) silica transporter, identified as Unit ID # 5.1, constructed in 1979, used to convey silica from silos 4.3, 4.4, and 4.5 to silica day bin # 6.1, utilizing a baghouse (Unit # 5.1) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID # 9;

(5) Two (2) oil extraction systems, identified as Unit ID #s 9.1 and 9.2, each system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing ~~a~~ carbon adsorber **system** (**CAS1 or CAS2)** to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 17;

(6) One (1) extruder, identified as Unit ID #8.1, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #14

(7) One (1) extruder, identified as Unit ID #8.2, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #16;

(8) Two (2) aerosol addition systems (mix towers), identified as Unit ID #s 10.1, 10.2, exhausting inside the building;

(b) Sub-Micro (SM) Line 6, installed in 1991, consisting of the following equipment:

(1) One (1) silo, identified as Unit ID # 4.5, used to store silica, with a maximum storage capacity of 75 tons, with a maximum throughput rate of 7.5 tons per hour, utilizing a bin filter (Unit ID # 4.5) for particulate matter control, exhausting through one (1) stack, identified as S/V ID # 8;

(2) Two (2) day bins, identified as Unit ID #s 7.1 and 7.2, used to store silica and polyethylene, respectively, each with a maximum storage capacity of 2.4 and 0.125 tons, respectively, and maximum throughput rate of 800.32 pounds per hour and 307.65 pounds per hour, respectively, each utilizing a bin filter (Unit ID #s 7.1 and 7.2) for particulate matter control, each exhausting through one (1) stack, identified as S/V ID #s 12 and 13, respectively;

(3) One (1) oil extraction system, identified as Unit ID # 9.3, system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing ~~a~~ carbon adsorber **system (CAS1 or CAS2)** to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # ~~17~~**18**;

(4) One (1) extruder, identified as Unit ID # 8.3, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #16;

(5) One (1) aerosol addition system (mix tower), identified as Unit ID # 10.3, exhausting inside the building;

(c) Sub-Micro (SM) Lines 3, 4 and 6 support equipment, consisting of storage tanks (Unit ID #s 11.1 through 11.6) and a trichloroethylene (TCE) recovery system (smokehouse) Unit ID #9.4.

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

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

~~**********~~

~~(l) One (1) Oil Conditioner, identified as ID No. 20.1, with a maximum flow rate capacity of 16.67 gallons of oil per minute (gpm), VOC and HAP emissions controlled by the existing carbon adsorption system (CAS**~~**1**~~**) exhausting to Stack No. 17, approved in 2015 for construction.~~

(**l**) **One (1) Solvent Concentrator System (SCS) and one (1) Carbon Adsorber System, identified as CAS2, exhausting to stack S/V 18, approved in 2018 for construction.**

During normal operation after the startup of CAS2, the CAS2 will control VOC emissions from the oil extraction system for Sub-Micro (SM) Line 6, three (3) storage tanks, ID #s 11.4 through 11.6 that support Sub-Micro Line 6 and the concentrated exhaust from the SCS during normal operations. The CAS2 may also control VOC emissions from the oil extraction systems for Sub-Micro (SM) Line 3 and Sub-Micro (SM) Line 4, three (3) storage tanks, ID #s 11.1 through 11.3 that support SM Line 3 and SM Line 4 and the trichloroethylene recovery system (Unit # 9.4) during maintenance, shutdown or failure of CAS1.

The SCS will be utilized to concentrate VOC leak emissions from oil extraction equipment located within the Sub-Micro Line 3 and Sub-Micro Line 4 oil extraction room; which includes leaks from equipment in liquid, vapor and vacuum trichloroethylene services.

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

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

SECTION D.1 Changes:

SECTION D.1 ~~FACILITY~~ **EMISSION UNIT** OPERATION CONDITIONS

~~Facility~~ **Emission Unit** Description: ~~[326 IAC 2-7-5(14)]~~

(a) Sub-Micro (SM) Line 3, installed in 1979, and Sub-Micro (SM) Line 4, installed in 1984, consisting of the following equipment:

(5) Two (2) oil extraction systems, identified as Unit ID #s 9.1 and 9.2, each system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing ~~a~~ carbon adsorber **system** (**CAS1 or CAS2)** to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # 17;

(6) One (1) extruder, identified as Unit ID #8.1, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #14;

(7) One (1) extruder, identified as Unit ID #8.2, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #16;

(8) Two (2) aerosol addition systems (mix towers), identified as Unit ID #s 10.1, 10.2, exhausting inside the building;

(b) Sub-Micro (SM) Line 6, installed in 1991, consisting of the following equipment:

(3) One (1) oil extraction system, identified as Unit ID # 9.3, system includes oil extraction pans, a solvent drying oven, a water drying oven, and a distillation unit, utilizing ~~a~~ carbon adsorber **system** (**CAS1 or CAS2)** to control volatile organic compounds and trichloroethylene, exhausting through one (1) stack, identified as S/V ID # ~~17~~**18**;

(4) One (1) extruder, identified as Unit ID # 8.3, amended in 2016 for a new control device, voluntary VOC controlled by an oil mist collector and exhausting through one (1) stack identified as S/V ID #16;

(5) One (1) aerosol addition system (mix tower), identified as Unit ID # 10.3, exhausting inside the building;

(c) Sub-Micro (SM) Lines 3, 4 and 6 support equipment, consisting of storage tanks (Unit ID #s 11.1 through 11.6) and a trichloroethylene (TCE) recovery system (smokehouse) Unit ID # 9.4.

~~(l) One (1) Oil Conditioner, identified as ID No. 20.1, with a maximum flow rate capacity of 16.67 gallons of oil per minute (gpm), VOC and HAP emissions controlled by the existing carbon adsorption system (CAS) exhausting to Stack No. 17, approved in 2015 for construction.~~

(**l**) **One (1) Solvent Concentrator System (SCS) and one (1) Carbon Adsorber System, identified as CAS2, exhausting to stack S/V 18, approved in 2018 for construction.**

During normal operation after the startup of CAS2, the CAS2 will control VOC emissions from the oil extraction system for Sub-Micro (SM) Line 6, three (3) storage tanks, ID #s 11.4 through 11.6 that support Sub-Micro Line 6 and the concentrated exhaust from the SCS during normal operations. The CAS2 may also control VOC emissions from the oil extraction systems for Sub-Micro (SM) Line 3 and Sub-Micro (SM) Line 4, three (3) storage tanks, ID #s 11.1 through 11.3 that support SM Line 3 and SM Line 4 and the trichloroethylene recovery system (smokehouse Unit # 9.4) during maintenance, shutdown or failure of CAS1.

The SCS will be utilized to concentrate VOC leak emissions from oil extraction equipment located within the Sub-Micro Line 3 and Sub-Micro Line 4 oil extraction room; which includes leaks from equipment in liquid, vapor and vacuum trichloroethylene services.

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

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

D.1.1 ~~General Reduction Requirements~~ **Volatile Organic Compounds** BACT **Limits** [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 **(New Facilities: General Reduction Requirements)**, the Permittee shall comply with the following BACT requirements **when CAS1 is the only control operating**:

(1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, Sub-Micro (SM) Line 4 and Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4), **except leak emissions from equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service,** shall be controlled by a Carbon Adsorption System (CAS) with an overall control efficiency of no less than 96%.

(2) The VOC emissions from the CAS**1** stack (S/V ID # 17) shall not exceed 46.2 pounds per hour.

(3) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.

(4) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the **trichloroethylene** recovery system (smokehouse, Unit ID # 9.4) when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the CAS**1** but the control efficiency of 96% shall not apply due to the expected low VOC inlet concentration.

(5) The control efficiency of 96% shall not apply when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID #11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.

~~(6) The implementation of a leak detection and repair (LDAR) program for equipment leaks as follows:~~

~~(i) The Permittee shall develop a written LDAR program requiring leak checks of all equipment in trichloroethylene service.~~

~~(ii) The LDAR program shall include the following elements:~~

~~(A) Written LDAR program - The written LDAR program shall specify the source's specific procedure for recordkeeping, certifications, monitoring and repair~~

~~(B) Training - The training programs can vary according to the level of involvement and degree of responsibility of LDAR personnel.~~

~~(C) LDAR audits - The audits shall check that the correct equipment is being monitored, LDAR program procedures are being followed, leaks are being fixed and the required records are being kept.~~

~~(D) Contractor accountability - The LDAR program shall describe oversight procedures to increase the accountability of contractors.~~

~~(E) Internal leak definition - The LDAR program shall include the internal leak definition applicable to equipment in TCE service~~

~~(F) More frequent monitoring - To ensure that leaks are still being identified in a timely manner and that previously unidentified leaks are not worsening over time, implement a plan for more frequent monitoring for components that contribute most to equipment leak emissions.~~

~~(G) First attempt at repair - Time frames and practices must be established for first attempt at repairing components to stop detected leaks while still small.~~

~~(H) Delay of repair compliance assurance - Any component that cannot be repaired during the specified repair interval must be placed on a "Delay of Repair" list to be repaired during the next shutdown cycle. Delay of repair compliance assurance procedures are to be included to ensure that the appropriate equipment is justifiably on the "Delay of Repair" list.~~

~~(I) Electronic monitoring and storage of data - Maintenance of an electronic database for storing and reporting LDAR data and use of data loggers or other data collection devices during all LDAR monitoring.~~

~~(J) QA/QC of LDAR data - A procedure to ensure QA/QC review of all data generated by LDAR monitoring.~~

~~(K) Calibration drift assessment - Calibration of LDAR monitoring equipment using an appropriate calibration gas, in accordance with 40 CFR Part 60, EPA Reference Test Method 21.~~

~~(L) Records of maintenance - Records must be maintained for the LDAR program in accordance with Section C - General Record Keeping Requirements.~~

(6) During maintenance, failure or shutdown of CAS2, CAS1 may receive emissions from the oil extraction systems for SM Lines 3, 4, 6, storage tanks (Unit ID#11.1 through 11.6), the trichloroethylene recovery system (smokehouse, Unit ID# 9.4), and the concentrated exhaust from the SCS as long as CAS1 maintains an overall control efficiency of no less than 96%.

(b) Pursuant to 326 IAC 8-1-6, (New Facilities: General Reduction Requirements), upon the initial startup of the SCS and CAS2, the Permittee shall comply with the following BACT requirements, when CAS 1 and CAS2 are both operating:

(1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, and Sub-Micro (SM) Line 4, and related support equipment consisting of storage tanks (Unit ID#11.1 through 11.3 and the trichloroethylene recovery system (smokehouse, Unit ID# 9.4), shall be controlled by CAS1 with an overall control efficiency of no less than 96%.

(2) The VOC emissions during operation of the oil extraction system for Sub-Micro (SM) Line 6 and related support equipment consisting of storage

tanks (Unit ID #s 11.4 through 11.6), except leak emissions from equipment that is required to be inspected for leaks under Condition D.1.1(d), or from equipment that is in the vacuum trichloroethylene service, and the VOC emissions in the concentrated exhaust from the SCS shall be controlled by CAS2 with an overall control efficiency of no less than 96%.

(3) The total VOC emissions from the CAS1 stack (S/V ID # 17) and CAS2 stack (S/V #18) shall not exceed 46.2 pounds per hour.

(4) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.

(5) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse, Unit ID # 9.4) and the VOC emissions from the concentrated exhaust from the SCS when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the Carbon Adsorption System but the control efficiency of 96% shall not apply due to the expected low VOC inlet concentration.

(6) The control efficiency of 96% shall not apply to CAS1 or CAS2 when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID# 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse Unit # 9.4) are operating. Note: SM Line 3 was installed in 1979.

(c) Pursuant to 326 IAC 8-1-6, (New Facilities: General Reduction Requirements), upon the initial startup of the SCS and CAS2, the Permittee shall comply with the following BACT requirements, when CAS2 is used as the only VOC control:

(1) The VOC emissions during operation of the oil extraction systems for Sub-Micro (SM) Line 3, Sub-Micro (SM) Line 4 and Sub-Micro (SM) Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse Unit # 9.4), except leak emissions from SM Line 6 equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service, and the VOC emissions in the concentrated exhaust from the SCS shall be controlled by CAS2 with an overall control efficiency of no less than 96%.

(2) The VOC emissions from the CAS2 stack (S/V #18) shall not exceed 46.2 pounds per hour.

(3) All off-specification material that is removed from SM Lines 3, 4 and 6 as a result of start-ups, wet folds, or web breaks shall be placed in the trichloroethylene recovery system (smokehouse) identified as Unit ID # 9.4.

(4) The VOC emissions occurring as evaporative losses from the oil extraction systems for SM Lines 3, 4, and 6 storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse, Unit ID # 9.4) and the VOC emissions in the concentrated exhaust from the SCS when the oil extraction systems for SM Lines 3, 4 and 6 are not in operation shall be controlled by the CAS2 but the control efficiency of 96% shall not apply due to the expected low VOC inlet concentration.

(5) The control efficiency of 96% from CAS2 shall not apply when only SM Line 3 and its support equipment consisting of storage tanks (Unit ID #11.1 through 11.6) and the TCE recovery system (smokehouse, Unit # 9.4) are

operating. Note: SM Line 3 was installed in 1979.

(d) The implementation of a leak detection and repair (LDAR) program for equipment leaks as follows:

(1) The Permittee shall develop a written LDAR program requiring leak checks of all equipment in trichloroethylene service.

(2) The LDAR program shall include the following elements:

(A) Written LDAR program - The written LDAR program shall specify the source's specific procedure for recordkeeping, certifications, monitoring and repair

(B) Training - The training programs can vary according to the level of involvement and degree of responsibility of LDAR personnel.

(C) LDAR audits - The audits shall check that the correct equipment is being monitored, LDAR program procedures are being followed, leaks are being fixed and the required records are being kept.

(D) Contractor accountability - The LDAR program shall describe oversight procedures to increase the accountability of contractors.

(E) Internal leak definition - The LDAR program shall include the internal leak definition applicable to equipment in TCE service

(F) More frequent monitoring - To ensure that leaks are still being identified in a timely manner and that previously unidentified leaks are not worsening over time, implement a plan for more frequent monitoring for components that contribute most to equipment leak emissions.

(G) First attempt at repair - Time frames and practices must be established for first attempt at repairing components to stop detected leaks while still small.

(H) Delay of repair compliance assurance - Any component that cannot be repaired during the specified repair interval must be placed on a "Delay of Repair" list to be repaired during the next shutdown cycle. Delay of repair compliance assurance procedures are to be included to ensure that the appropriate equipment is justifiably on the "Delay of Repair" list.

(I) Electronic monitoring and storage of data - Maintenance of an electronic database for storing and reporting LDAR data and use of data loggers or other data collection devices during all LDAR monitoring.

(J) QA/QC of LDAR data - A procedure to ensure QA/QC review of all data generated by LDAR monitoring.

(K) Calibration drift assessment - Calibration of LDAR monitoring equipment using an appropriate calibration gas, in accordance with 40 CFR Part 60, EPA Reference Test Method 21.

(L) Records of maintenance - Records must be maintained for the LDAR program in accordance with Section C - General Record Keeping Requirements.

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

D.1.3 Operation of VOC Controls

(a) ~~The Carbon Adsorption System (CAS)~~ **Prior to the initial startup of the SCS and CAS2, CAS1** shall be in operation at all times and control emissions from the oil extraction systems for SM Lines **-** 3, 4 and 6, storage tanks~~, IDs~~ **(ID#s** 11.1 through 11.6**)**, **and** the trichloroethylene recovery system (smokehouse, Unit ID# 9.4) ~~and the oil conditioner, ID No. 20.1,~~ **except leak emissions from equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service. Equipment means each pump, compressor, agitator, pressure relief device, sampling connection system, open ended valve or line, valve connector, surge control vessel, bottom receiver and instrumentation system in trichloroethylene service.**

(b) After the initial startup of the SCS and CAS2, CAS1 and/or CAS2 shall be in operation at all times and control emissions from the oil extraction systems for SM Lines 3, 4 and 6, storage tanks IDs (ID#s 11.1 through 11.6) the trichloroethylene recovery system (smokehouse, Unit ID# 9.4) and the concentrated exhaust from the SCS, except leak emissions from SM Line 6 equipment that is required to be inspected for leaks under Condition D.1.1(d) or from equipment that is in vacuum trichloroethylene service. Equipment means each pump, compressor, agitator, pressure relief device, sampling connection system, open ended valve or line, valve connector, surge control vessel, bottom receiver and instrumentation system in trichloroethylene service.

(c) Upon the initial startup of SCS, the SCS shall be in operation at all times and used to concentrate trichloroethylene laden ambient air , except trichloroethylene escaping through open doorways, that is removed from the room containing the oil extraction system for SM Line 3 and SM Line 4 and the concentrated SCS exhaust routed to CAS1 or CAS2 whenever the oil extraction system for SM Line 3 or SM Line 4 is operating. Doors to this room must remain closed at all times except during necessary access purposes.

(~~b~~**d**) When the oil extraction systems for SM Lines 3, 4 and 6 are in operation, one (1) of the two (2) carbon beds **in each CAS that is operating** shall be regenerated at least once every ninety (90) minutes, while one (1) carbon bed **in the CAS** is operating.

(e) CAS2 must be designed to accommodate CAS2 inlet trichloroethylene concentration of at least 10,000 ppmv given a CAS2 inlet air flow rate of at least 5,600 scfm.

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

(a) Not later than 180 days after the initial startup of the new Solvent Concentrator System (SCS) and the new Carbon Adsorber System (CAS2) when controlling the oil extraction systems for the existing Sub-Micro Line 3, Sub-Micro Line 4, and Sub-Micro Line 6, the related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the trichloroethylene recovery system (smokehouse, Unit ID # 9.4) and the concentrated exhaust from the SCS, the Permittee shall perform VOC testing of CAS2 to verify compliance with Condition D.1.1(c)(1) and (2), utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required

by this condition.

(b) Not later than 180 days after both the initial startup of CAS1 when controlling the oil extraction systems for Sub-Micro Line 3 and Sub-Micro Line 4 and related support equipment consisting of storage tanks (Unit ID#s 11.1 through 11.3) and the trichloroethylene recovery system (smokehouse, Unit ID# 9.4) and the initial startup of CAS2 when controlling the existing Sub-Micro Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.4 through 11.6) and the concentrated SCS exhaust, the Permittee shall perform a combined VOC testing of CAS1 and CAS2 to verify compliance with Condition D.1.1(b)(1), (2) and (3), utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

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

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

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

(a) The Permittee shall certify and maintain a continuous VOC monitoring system ~~within 180 days of permit issuance~~ **for each CAS1 and CAS2**.

(b) The Permittee must install, certify and maintain a continuous VOC monitoring system for CAS2 within sixty (60) days after initial startup of CAS2. This monitoring system must be calibrated and operated to measure the VOC control efficiency of CAS2 and shall be in operation at all times that any of the oil extraction systems for SM Lines 3, 4 or 6 are in operation and any of their respective emissions are routed to CAS2. Permittee shall develop a QA/QC Plan in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 3.

(~~b~~**c**) The continuous VOC monitoring systems shall be calibrated and operated to measure the control efficiency of the carbon adsorber systems (CAS) serving oil extraction systems for SM-3, SM-4 and SM-6. The continuous VOC monitoring system shall be in operation at all times the oil extraction systems for **any one of** Lines **SM-3,** SM-4 or SM-6 are in operation, except during periods the monitoring system is undergoing quality assurance/quality control checks, repairs, replacement or maintenance or is malfunctioning. "Continuous" shall mean the collection of at least one measurement of CAS inlet and CAS outlet VOC concentrations for each 15-minute block period. Compliance is indicated if the 24-hour average CAS control efficiency is no less than 96%.

(~~c~~**d**) Relative Accuracy Test Audits (RATAs) must be performed on the monitoring systems no less than once every 5 years.

(~~d~~**e**) Zero and Span calibrations shall be performed no less frequently than once per week. According to the procedures of 40 CFR Part 60 Appendix F Section 4.0, any reading in

excess of 2.5% of span would require immediate corrective action, **to eliminate the problem. A**~~a~~ny reading greater than 10% of span would be considered out of control **and would require immediate corrective action. An initial attempt at corrective action must be taken within four (4) hours of the failed calibration. If a successful calibration is not completed within two (2) days, the Permittee must follow the monitoring procedure in Condition D.1.5(h) with a properly calibrated analyzer.**

(~~e~~**f**) The Permittee shall respond to monitor out of control periods as defined in 40 CFR Part 60, Appendix F, Section 4.3.1.

(~~f~~ **g**) Quarterly Cylinder Gas Audits shall be performed in any quarter where a RATA is not conducted.

(~~g~~ **h**) If the continuous VOC monitoring system is down for more than 5 days, the Permittee shall take daily instantaneous measurements of the outlet VOC concentration of the CAS (using a handheld flame ionization detector, photo-ionization detector or comparable device) and at the same time record the value of the CAS exhaust gas flow rate. Provided the CAS exhaust gas flow rate is less than or equal to 5,652 standard cubic feet per minute (scfm), compliance is indicated if the CAS outlet VOC concentration is less than 400 ppmv , and no measurement of the CAS inlet VOC concentration or calculation of CAS efficiency is required for that day. If the outlet CAS VOC concentration is greater than 400 ppmv, then a daily grab measurement of the CAS inlet VOC concentration (using a colorimetric tube analysis) shall also be taken and the CAS control efficiency calculated to provide an indication of compliance. CAS control efficiency shall be calculated using the VOC concentration data as follows:

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

Daily measurements of CAS exhaust gas flow rate and VOC inlet and outlet concentrations shall be taken within the final 30 minutes of a carbon bed cycle and shall be taken when the CAS cooling air blower is not operating. The CAS cooling air blower is not operating when the measured CAS exhaust gas flow rate is less than or equal to 5,652 scfm. In the event that the outlet VOC concentration is greater than 400 ppmv and the CAS efficiency is less than 96%, the Permittee shall perform reasonable response steps to achieve 96% CAS efficiency **including the requirements of Condition D.1.6 in the event of a failure of the CAS.** During continuous VOC monitoring system downtime, the Permittee shall continue to make daily CAS efficiency calculations until a CAS efficiency of 96% or more is achieved for seven (7) consecutive operating days. Upon achieving a daily CAS efficiency of 96% or more for seven (7) consecutive operating days, the Permittee may resume daily measurement of the outlet VOC concentration during continuous VOC monitoring system downtime.

(i) Under no circumstances should CAS2 take on an air flow or concentration beyond the maximum air flow or trichloroethylene concentration specified by the manufacturer. An air flow or concentration beyond the manufacturer specifications is not a deviation of this permit as long as the CAS operates in compliance with the control efficiency requirement.

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

In the event that carbon adsorber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Conditions ~~D.1.1(a)~~ **D.1.1(a)(1), (2) or D.1.1(b)(1), (2), (3) or D.1.(c)(1), (2) based on which CAS is operating** and D.1.5, the Permittee shall maintain records in accordance with (1) through (6). Records of all data and operating parameters shall be complete and sufficient to establish compliance with the limits established in Condition ~~D.1.1(a)~~ **D.1.1(a)(1), (2) or D.1.1(b)(1), (2), (3) or D.1.(c)(1), (2) based on which CAS is operating** and the monitoring conditions established in Condition D.1.5.

(1) Permittee shall maintain records of the readings of the continuous VOC monitoring system.

(2) All corrective and preventive actions taken.

(3) All maintenance logs, calibration checks, and other required quality assurance activities.

(4) A log of plant operations, including emission unit or monitoring system downtime with the following information:

(A) Date of emissions unit or monitoring system downtime.
(B) Time of commencement and completion of each downtime.
(C) Reason for each downtime.
(D) Nature of system repairs and adjustments

(5) Records of carbon bed desorptions/regenerations which shall include date and time of desorption.

(6) Records of once daily vapor leak checks of the vapor collection system downstream of the solvent-laden air (SLA) blower ~~on the~~ **for each** CAS and response steps taken if any. A leak is defined as greater than or equal to 10,000 ppmv, as methane.

(b) To document the compliance status with Condition D.1.1(d), the Permittee shall maintain the records required by the written LDAR program.

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

D.1.8 Reporting Requirements

A semi-annual report shall be submitted no later than thirty (30) days after the end of the semi-annual period being reported. The report shall contain a monthly summary of the readings from the continuous VOC monitoring system to document the compliance status with Conditions D.1.1(a)**(1), (2) or D.1.1(b)(1), (2), (3) or D.1.(c)(1),(2) based on which CAS is operating** and D.1.5. The report shall include the following information:

(1) 24-hour average or daily average CAS control efficiency readings less than 96% and date of such readings.

(2) Continuous VOC monitoring system instrument downtime, except for zero (0) and span checks, shall include the following:

(A) Date of downtime.

(B) Time of commencement.
(C) Duration of each downtime.
(D) Reasons for each downtime.
(E) Nature of system repairs and adjustments.

(3) A notation and a reason for a lack of readings from the continuous VOC monitoring system (e.g., the process did not operate that day).

(4) If there are no excess emissions or continuous VOC monitoring instrument downtime in a reporting period, the Permittee shall submit a report indicating that no excess emissions or downtime incidents occurred in the reporting period.

(5) The semi-annual report shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit.

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

Additional Change:

IDEM made the following additional changes:

The Part 70 Permit Renewal No. T061-31760-00012 permit reviewer was Aida DeGuzman and not AB/EVP. Therefore, the permit header was corrected in this SPM 061-39511-00012.

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-2(a) (Cold cleaner degreaser control equipment and operating requirements), ~~for cold cleaning operations constructed after July 1, 1990~~, the Permittee shall ensure that the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.
(2) Equip the degreaser with a device for draining cleaned parts.
(3) Close the degreaser cover whenever parts are not being handled in the degreaser.
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
(6) Store waste solvent only in closed containers.
(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

****

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

~~(a)~~ Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers), ~~on and after January 1, 2015,~~ the Permittee shall not operate the cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

~~(b) On and after January 1, 2015, the following record keeping requirements shall apply:~~

~~(1) The Permittee shall maintain each of the following records for each solvent purchased for use in the cold cleaner degreaser operation:~~

~~(A) The name and address of the solvent supplier.~~

~~(B) The date of purchase (or invoice/bill date of contract servicer indicating service date).~~
~~(C) The type of solvent purchased.~~
~~(D) The total volume of the solvent purchased.~~
~~(E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).~~

D.5.3 Record Keeping Requirements

To document the compliance status with Condition D.5.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

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

(c) The type of solvent purchased.

(d) The total volume of the solvent purchased.

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

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

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

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDD**D** (included as Attachment B to the operating permit), for Boiler Unit ID #1.1:

(1) 40 CFR ~~§~~ 63.7480
(2) 40 CFR ~~§~~ 63.7485
(3) 40 CFR ~~§~~ 63.7490(d)
(4) 40 CFR ~~§~~ 63.7491
(5) 40 CFR ~~§~~ 63.7495(b)
(6) 40 CFR ~~§~~ 63.7499
(7) 40 CFR ~~§~~ 63.7500(a)(1), (e), (f)
(8) 40 CFR ~~§~~ 63.7501
(9) 40 CFR ~~§~~ 63.7505(a)
(10) 40 CFR ~~§~~ 63.7510(e)
(11) 40 CFR ~~§~~ 63.7515(d)
(12) 40 CFR ~~§~~ 63.7540(a)(10), (13), (d)
(13) 40 CFR ~~§~~ 63.7545(a), (b), (f)
(14) 40 CFR ~~§~~ 63.7550(a), (b), (c)(1), (c)(5)(i) through (iv), (xiv) and (xvii)
(15) 40 CFR ~~§~~ 63.7555(a), (h)
(16) 40 CFR ~~§~~ 63.7560

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDD (included as Attachment B to the operating permit), for Boiler Unit ID #2.1-2:

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

E.4.2 Stationary Compression Ignition Internal Combustion Engines NSPS [326 IAC 12] [40 CFR Part 60, Subpart IIII]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

1) 40 CFR § 60.4205(c)
(2) 40 CFR § 60.4206
(3) 40 CFR § 60.4207(b)
(4) 40 CFR §60.4209(a)
(5) 40 CFR § 60.4211(a), (c), (f), (g)(2)
(6) 40 CFR § 60.4214(b)
(7) 40 CFR § 60.4218
(8) 40 CFR §§ 60.4219

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 May 3, 2017.

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 Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Aida DeGuzman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4972 or toll free at 1-800-451-6027, and ask for (317) 233-4972.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

March 21, 2018

Maggie Fox
Daramic LLC
3430 Cline Rd NW
Corydon IN 47112

Re: Public Notice
Daramic LLC
Permit Level: Title V- Sig Permit Mod
Permit Number: 061-38511-00012

Dear Maggie Fox:

Enclosed is a copy of your draft Title V- Sig Permit Mod, 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 Corydon Democrat in Corydon, IN publish the abbreviated version of the public notice no later than Wednesday March 28, 2018. 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 Corydon Public Library, 117 West Beaver Street in Corydon IN. 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 Aida deguzman, 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 3-4972 or dial (317) 233-4972.

Sincerely,

Halley Mays
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

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Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

March 21, 2018

Corydon Democrat
301 N. Capitol Avenue
Corydon, Indiana 47112

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Daramic LLC, Harrison 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 Wednesday March 28, 2018.

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 Halley Mays at 800-451-6027 and ask for extension 2-6698 or dial 317-232-6698.

Sincerely,

Halley Mays
Permit Branch
Office of Air Quality

Permit Level: Title V- Sig Permit Mod
Permit Number: 061-38511-00012

Enclosure

PN Newspaper Letter 1/9/2017

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Eric J. Holcomb, *Governor*
Bruno L. Pigott, *Commissioner*

March 21, 2018

To: Corydon Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Daramic LLC
Permit Number: 061-38511-00012

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 1/9/2017

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

March 21, 2018
Daramic LLC
061-38511-00012

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 Letter 1/9/2017

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

March 21, 2018

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

Permit Number: **061-38511-00012**
Applicant Name: **Daramic LLC**
Location: **Corydon, Harrison County, Indiana**

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

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

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

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

Mail Code 61-53

IDEM Staff	HMAYS 3/21/2018 Daramic LLC 061-38511-00012 (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		Maggie Fox Daramic LLC 3430 Cline Rd NW Corydon IN 47112 (Source CAATS)									
2		Joe Masching Plant Manager Daramic LLC 3430 Cline Rd NW Corydon IN 47112 *(RO CAATS)*									
3		Harrison County Health Department 241 Atwood Street Ste#200 Corydon IN 47112-1882 *(Health Department)*									
4		Corydon Town Council 113 N. Oak St. Corydon IN 47112 *(Local Official)*									
5		Corydon Public Library 117 West Beaver Street Corydon IN 47112 *(Library)*									
6		Harrison County Clerk 300 North Capital Ave Rm #203 Corydon IN 47112 *(Local Official)*									
7											
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15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***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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