

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW**
OFFICE OF AIR MANAGEMENT

**Chem Tech, Inc.
501 Bloomingdale Road
Bristol, Indiana 46507**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, 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.: F039-6982-00427	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates an adhesive manufacturing plant, which involves aerosol and drum filling.

Responsible Official: Dennis Brosh
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: 501 Bloomingdale Road, Bristol, Indiana 46507
SIC Code: 3322
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (A) Blending tanks A, B, C. Tank A is used to blend nonflammable product, which has a capacity of 300 gallons. This blending tank A is capable of blending 2,800 pounds of product per batch. Blending tank B and C are used to blend flammable products. Blending tank B has a capacity of 175 gallons, and is capable of blending 1,095 pounds of product per batch. Blending tank C has a capacity of 500 gallons and is capable of blending 2,800 pounds of product per batch.
- (B) Aerosol can filling operations, which is capable of filling 1,120 cans per batch, and
- (C) A propane tank D, which has a capacity of 18,000 gallons. Propane is used as aerosol propellant.

Emission units Under Enhanced New Source Review (ENSR):

- (A) Blending tanks E and F, will be used to blend non flammable products. Each blending tank has a capacity of 300 gallons, and each is capable of blending 2,800 pounds of nonflammable product per batch.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Space heaters, process heaters, or boilers using the following fuels:
 - (A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

B.2 Definitions [326 IAC 2-8-1]

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

- (b) Indiana rules from 326 IAC quoted 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 FESOP under 326 IAC 2-8.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than April 15 of each year to:

Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
 - (1) The 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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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, OAM, 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM 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 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, 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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-8-3. 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(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) Delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM upon receiving a timely and complete 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 until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 until IDEM, OAM, 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 in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every and relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such 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 by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in 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 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAM 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.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

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

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit of any regulated pollutant from the entire source shall be limited to 8.25 tons per month. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to 9.4 tons per month.
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to 24 tons per month.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2(Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) 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.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions

crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM, OAM.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

No later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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 regardless if asbestos is present.
- (b) Written notification is to be 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
 - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires prior to a renovation/demolition the owner or operator must use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 40 CFR 68 is an applicable requirement, and the Permittee shall:

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.

- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM reserves the right to utilize enforcement activities to resolve the non-compliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

-
- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Data Support Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

C.16 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) When the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;

- (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (c) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
 - (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
 - (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
 - (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

- (A) Blending tanks A, B, C. Tank A is used to blend nonflammable product, which has a capacity of 300 gallons. This blending tank is capable of blending 2,800 pounds of product per batch. Blending tank B and C are used to blend flammable products. Blending tank B has a capacity of 175 gallons, and is capable of blending 1,095 pounds of product per batch. Blending tank C has a capacity of 500 gallons and is capable of blending 2,800 pounds of product per batch.
- (B) Aerosol can filling operations, which is capable of filling 1,120 cans per batch, and
- (C) A propane tank D, which has a capacity of 18,000 gallons. Propane is used as aerosol propellant.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 BACT Minor Limitation

The volatile organic compounds (VOC) input usage from the following blending tanks shall be limited as follows:

- (a) blending tank A shall not exceed 82.5 tons per month,
- (b) blending tank B shall not exceed 82.5 tons per month, and
- (c) blending tank C shall not exceed 82.5 tons per month.

Each blending tank VOC input limit will result in a VOC emissions of 1.65 tons per month, or a 2% loss of the VOC input limit. Compliance with this condition will make the requirements of 326 IAC 8-1-6, Best Available Control Technology (BACT) not applicable.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1.
 - (1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, sales invoices and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to the raw materials and those used as cleanup solvents;
 - (2) A log of the dates of use;

- (3) The volume weighted VOC content of the raw material used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY CONDITIONS

- (A) The construction of blending tanks E and F, which will be used to blend non flammable products. Each blending tank has a capacity of 300 gallons, and each is capable of blending 2,800 pounds of non flammable products per batch.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

- D.2.1 This permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
- D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

- D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
- (a) The attached affidavit of construction shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the

Permit Administration & Development Section and attach it to this permit.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

2.6 BACT Minor Limitation

The volatile organic compounds (VOC) input usage from the following blending tanks shall be limited as follows:

- (a) blending tank E shall not exceed 82.5 tons per month, and
- (b) blending tank F shall not exceed 82.5 tons per month,

Each blending tank VOC input limit will result in a VOC emissions of 1.65 tons per month, or a 2% loss of the VOC input limit. Compliance with this condition will make the requirements of 326 IAC 8-1-6, Best Available Control Technology (BACT) not applicable.

D.2.7 PSD Minor Limitation [326 IAC 2-2] [40 CFR 52.21]

Upon the construction of the facilities in this modification, the VOC input usage from blending tanks A, B, C, E, F and from the aerosol can propellant filling shall be limited to 412 tons per month. This input usage limit will result in a VOC emissions of 8.25 tons per month, or a 2% loss of the total VOC input limit. Compliance with this condition shall make 326 IAC 2-2, the Prevention of Significant Deterioration (PSD), 40 CFR 52.21, and 326 IAC 2-7, Part 70 requirements not applicable.

Compliance Determination Requirements

D.2.8 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no applicable compliance monitoring conditions for these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.6, and 2.7, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.6, and 2.7.
 - (1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, sales invoices, and material safety data sheets (MSDS)

necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to the raw materials and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the raw materials used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.6 and 2.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: F039-6982-00427

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:

- 9 Annual Compliance Certification Letter
- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47741 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT**

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: F039-6982-00427

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:

Equipment/Operation:

Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit:
(ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)

Determination Period for this Parameter:
(ex: 365-day rolling sum, fixed monthly rate)

9 Permit Has No Rate Limitations for this Parameter.

Content Restriction for this Parameter:
(ex: maximum of 40% VOC in inks, 0.5% sulfur content)

Demonstration Method for this Parameter:
(ex: MSDS, Supplier, material sampling & analysis)

9 Permit Has No Content Limitations for this Parameter.

Comments:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: F039-6982-00427
Facility: Adhesive blending tanks A, B, C, E, and F
Parameter: VOC
Limit: Blending tanks A, E, and F - each is limited to 82.5 tons of VOC input/month
Blending tanks B and C - each is limited to 82.5 tons of VOC input/month

Year: _____

	VOC Usage (tons/month)				
Month	Tank A	Tank E	Tank F	Tank B	Tank C

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: F039-6982-00427
Facility: Source wide
Parameter: VOC, and HAPs
Limit: VOC input usage - 412 tons/month
Single HAP - 0.78 ton/month
Any combination of HAPs - 2 tons/month

Year: _____

Month	VOC Usage (tons/month)	Single HAP (tons/month)	Combined HAPs (tons/month)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background And Description

Source Name: Chem Tech Inc.
Source Location: 501 Bloomingdale Road, Bristol, Indiana 46507
County: Elkhart
SIC Code: 3322
Operation Permit No.: F039-6982-00427
Permit Reviewer: Aida De Guzman

The Office of Air Management (OAM) has reviewed an ENSR and Federally Enforceable State Operating Permit (FESOP) application from Chem Tech Inc. relating to the operation of an adhesive manufacturing plant, which involves aerosol and drum filling.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (A) Blending tanks A, B, C. Tank A is used to blend nonflammable product, which has a capacity of 300 gallons. This blending tank is capable of blending 2,800 pounds of product per batch. Blending tank B and C are used to blend flammable products. Blending tank B has a capacity of 175 gallons, and blending tank C has a capacity of 500 gallons. These tanks are capable of blending a combined total of 1,095 pounds of product per batch. All tanks were constructed on August 1992.

This include a propane tank D, which has a capacity of 18,000 gallons. Propane is used as aerosol propellant.

Emission units Under Enhanced New Source Review (ENSR):

- (A) The proposed construction of blending tanks E and F, used to blend non flammable products. Each blending tank has a capacity of 300 gallons, and each is capable of blending 2,800 pounds of nonflammable product per batch.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Space heaters, process heaters, or boilers using the following fuels:
- (A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
 - (1) Open blending tanks A, B, C. Tank A has a capacity of 300 gallons. Tank B has a capacity of 175 gallons, and tank C has a capacity of 500 gallons.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete FESOP application for the purposes of this review was received on October 23, 1996. Series of additional information was received on December 2, 1996, April 1, 1997 and May 1, 27, and 28, 1997.

Emissions Calculations

- (A) Adhesive blending in open tanks:

There are no emission factors found in the AP-42 for this type of operation.

Adhesive manufacturing is similar to paint and varnish manufacturing which involves the blending and mixing of different ingredients in mixing tanks. The emission factor for paint and varnish manufacturing is 2%. Chem Tech verified this emission factor through a "mass balance" procedure. The information regarding this was submitted for the year 1995, which indicates that 1.8 % of the material used is lost or assumed to be emitted. An emission factor of 2% will be utilized in the emission calculations.

Materials	Density (lb/gal)	Maximum Batch /Year	Maximum Batch Size (lb/batch)	% HAP by Weight	% VOC by Weight	% Flash Off	VOC Emissions (ton/yr)	HAPs Emissions (ton/yr)
Tanks A, E, and F (Nonflammable products)								
Methylene Chloride (non photochemically Reactive hydrocarbon)	11.2	2,190	2,800	99.9%	0.0	2%	0.0	61.3 * 3 tanks= 183.9
1,1,1-trichloroethane	This chemical is a non photochemically reactive hydrocarbon , and it is not a HAP.							

Mineral Spirits	6.58	2,190	2,800	0.0	100%	2%	61.3 * 3 tanks = 183.9	0.0
Benzene				0.01%				0.01 * 3 = 0.03
Toluene				0.1%				0.06 * 3 = 0.2
Xylene				0.6%				0.37 * 3 = 1.1
Ethylbenzene				0.2%				0.12 * 3 = 0.36
Cumene				0.1%				0.06 * 3 = 0.2
Naphthalene				0.06%				0.037 * 3 = 0.11
Hexane				0.2%				0.12 * 3 = 0.36
Trichloroethylene	12.13	2,190	2,800	99.4%	99.4%	2%	60.9 * 3 tanks = 182.7	60.9 * 3 tanks = 182.7
Tanks B and C (Flammable Products)								
Hexane	5.49	1,095 capacity for both tanks	2,800 capacity for both tanks	100%	100%	2%	30.7	30.7
Toluene	7.21	1,095 capacity for both tanks	2,800 capacity for both tanks	100%	100%	2%	30.7	30.7
Cyclohexane	6.49	1,095 capacity for both tanks	2,800 capacity for both tanks	100%	N/D	2%	30.7	
Propellant can filling							3.4	0.0
Total							218.0	Total Single Worst HAP = 31.06 Total Combined Worst HAPs = 214.6

Note: The italicized are the materials that emit the most HAP and VOC, which are then added to 25% solids, i.e. black oxide, etc. to make up the adhesive.

Methodology:

VOC Emissions, ton/yr = Max. batch/yr * Max. batch size, lb/batch * ton/2000 lb * % VOC by wt. * flash off%

HAP Emissions, ton/yr = Max. batch/yr * Max. batch size, lb/batch * ton/2000 lb * % HAP by wt. * flash off%

(B) Propellant Can Filling:

There are 1120 cans filled per batch of adhesives produced. There are no emission factor in AP-42 available for this type of operation. The emission factor of 0.0008 lb propane/can filled for pressure filling will be utilized, which was developed by testing at the CCL Custom Manufacturing Barr/Niles Company in Niles, Illinois.

The VOC emissions will be determined using the following methodology:

$$\begin{aligned} \text{VOC emission, ton/yr} &= 1120 \text{ cans filled/batch} * 21 \text{ batches/day} \\ &\quad * \text{Ef, } 0.0008 \text{ lb/can} * \text{ton/2000 lb} * 365 \text{ days/yr} \\ &= 3.4 \text{ ton/yr} \end{aligned}$$

(C) Propane tank D:

There are no emissions from this pressurized tank, because it is designed to operate in excess of

twenty-nine and four-tenths (29.4) pounds per square inch absolute pressure.

(D) Insignificant Activities (5 natural gas-fired heater, each has a capacity of 0.073 mmBtu/hr):

See page 1 of 1 TSD Appendix A for detailed emission calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	218.0
CO	0.0
NO _x	0.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential Emissions (tons/year)
Methylene Chloride	183.9
Trichloroethylene *	182.7
Hexane	31.06
Toluene *	30.9
Benzene *	0.2
Xylene *	1.1
Ethylbenzene *	0.36
Cumene *	0.2
Naphthalene *	0.11
TOTAL	429.97

* - These are the HAPs that can possibly be emitted by the source. The ones without the asterisk are the worst case HAPs.

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit volatile organic compounds (VOC) of 99 tons per year, consisting of:
 - (i) 98.0 tons per year for the significant activities; and
 - (ii) 1.0 tons per year for the insignificant activities.
- b) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Potential To Emit (tons/year)			
Process/facility	VOC	Single HAP	HAPs Combined
Adhesive production	98.0	9.4	24.0
Insignificant Activities	1.0	0.0	0.0
Total Emissions	99.0	9.4	24.0

Attached Table 1 summarize the permit conditions and requirements.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	attainment or unclassifiable
PM-10	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

1. New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart K- Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which construction, reconstruction, or modification commenced after July 23, 1984, with a capacity greater than or equal to 40 cubic meters (10,567 gallons) that is used to store volatile organic liquids.

All Chem Tech's blending tanks have capacity as follows:

- (1) Tank A - 300 gallons
- (2) Tank B - 175 gallons
- (3) Tank C - 500 gallons
- (4) Tank E - 300 gallons
- (5) Tank F - 300 gallons

All the above tanks will not be subject to this NSPS, because they are blending tanks and not storage tanks.

2. No other New Source Performance Standards (326 IAC 12) will be applicable to these tanks, including Subparts K, and Ka, because these tanks are blending tanks and not storage tanks.
3. National Emission Standards for Hazardous Air pollutants (NESHAP) - There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

1. This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than (ten (10) tons of VOC per year for Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).
2. 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:
 - (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
 - (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

1. 326 IAC 8-9-1 (Volatile organic liquid storage vessels)
Chem Tech's tanks A, B, C, E and F are process or blending open top tanks and are not storage tanks, each tank's capacity is well below 39,000 gallons and they are not located in Clark, Floyd, Lake and Porter counties. Therefore, these tanks are not subject to this rule.
2. 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements)
Blending tanks B and C are subject to 326 IAC 8-1-6, because their total VOC potential emissions are greater than 25 tons per year. Blending tanks A, E, and F are each subject to this rule also, since each potential VOC emissions are greater than 25 tons per year. The company requested a total limit in VOC emissions to 24 tons per year for blending tanks B and C. Each blending tank A, E, and F will be limited to 24 tons of VOC per year. Therefore, the BACT requirements under this rule will not apply.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. 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.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

Conclusion

The operation of this adhesive production plant will be subject to the conditions of the attached proposed **FESOP No. F039-6982-00427**.

Table (I)

Emission Unit: Blending tanks A, B, C, E & F				
Date of Construction: 1992 - Blending tanks A, B & C proposed- Blending tanks E & F				
Alternative Scenario: none				
Pollution Control Equipment: none				
General Description of Requirement:	Limit each blending tank's (A, B, & C) VOC usage to 24 tons/yr. Limit the total VOC usage from blending tanks B & C to 24 tons/yr	Source wide VOC input limit	Source wide HAPs input limit	
Numerical Emission Limit:	see above	99 ton/yr	9 ton/yr for single HAP. 24 tons/yr for any HAPs combined	
Regulation/Citation:	326 IAC 8-1-6	326 IAC 2-8-4(1)	326 IAC 2-8-4(1)	
Compliance Demonstration:	Record keeping and reporting of the amount of VOC usage, and amount sold (purchase orders, invoices, sales receipts, MSDS)	Record keeping and reporting of the amount of VOC usage, and amount sold (purchase orders, invoices, sales receipts, MSDS)	Record keeping and reporting of the amount of HAP usage, and amount sold (purchase orders, invoices, sales receipts, MSDS)	
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	n/a	n/a		
Testing Method/Analysis:	n/a	n/a		
Testing Frequency/Schedule:	n/a	n/a		
Submittal of Test Results:	n/a	n/a		
COMPLIANCE MONITORING				
Monitoring Description:				
Monitoring Method:	Record keeping and reporting of the amount of VOC usage, and amount sold (purchase orders, invoices, sales receipts, MSDS)	Record keeping and reporting of the amount of VOC usage, and amount sold (purchase orders, invoices, sales receipts, MSDS)	Record keeping and reporting of the amount of HAP usage, and amount sold (purchase orders, invoices, sales receipts, MSDS)	
Monitoring Regulation/Citation:	326 IAC 8-1-6	326 IAC 2-8-5(a)(1)	326 IAC 2-8-5(a)(1)	
Monitoring Frequency:	monthly			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	VOC	VOC	HAPs	
Recording Frequency:	monthly	monthly	monthly	
Submittal Schedule of Reports:	Quarterly	Quarterly	Quarterly	
REPORTING REQUIREMENTS				
Information in Report:	Amount of material containing VOC, VOC wt.% of each material	Record keeping and reporting of the amount of VOC usage, and amount sold (purchase orders, invoices, sales receipts, MSDS)	Record keeping and reporting of the amount of HAP usage, and amount sold (purchase orders, invoices, sales receipts, MSDS)	

Reporting Frequency/Submittal:	Quarterly	Quarterly	Quarterly	
Additional Comments:				

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Commercial Boiler**

Company Name: Chem Tech Inc.
Address City IN Zip: 501 Bloomingdale Road, Bristol, IN 46507
FESOP: 039-6982
Plt ID: 039-00427
Reviewer: Aida De Guzman
Date: 05/28/97

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.4

3.5

Pollutant

Emission Factor in lb/MMCF	PM	PM10	SO2	NOx	VOC	CO
	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.2	0.0	0.0

5 nat. gas-fired heaters @ 0.073 mmBtu/hr (insignificant activities)

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Name: Chem Tech, Inc.
Source Location: 501 Bloomingdale Road, Bristol, Indiana 46507
County: Elkhart
FESOP: F039-6982-00427
SIC Code: 3322
Permit Reviewer: Aida De Guzman

On August 1, 1997, the Office of Air Management (OAM) had a notice published in the Elkhart, Truth, Elkhart, Indiana, stating that Chem Tech, Inc. had applied for a Federally Enforceable State Operating Permit and ENSR for an adhesive manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 1, 1997 Chem Tech, Inc. had requested a 30-day deferral on the issuance of their permit to complete their comments. However, on November 14, 1997 another 30-day deferral was requested by Chem Tech, for their permit issuance. Finally, on December 8, 1997 the company had submitted comments on the proposed FESOP and ENSR. The summary of the comments and corresponding responses is as follows:

1. Comment: Chem Tech, Inc.

On page 5 of 34, Section A.2(A) last paragraph states a combined total of 1,095 pounds of product per batch. This paragraph should state that tank B can blend 1,095 pounds while tank C can blend 2,800 pounds per batch.

1. Response: OAM

The permit was written based on the information provided in the application. This information was also verified with the consultant. Obviously, the information provided in the application was incorrect, section A.2(A) last paragraph will be adjusted to have the blending capability of tank B as 1,095 pounds and tank C as 2,800 pounds. These changes will make tank B and C subject to 326 IAC 8-1-6, however, each tank will be limited to 24 tons per year in order to avoid the requirements of this rule.

2. Comment: Chem Tech, Inc.

Page 26 of 34, Section D.1, the same correction as noted above should be included to replace the last sentence.

2. Response: OAM

Page 26 of 34, Section D.1 last paragraph will be revised to reflect the above changes.

3. Comment: Chem Tech, Inc.

Change the "VOC input usage" into "VOC emissions". tank B and C are separate facilities and each should have a BACT VOC limit of 2 tons per month.

3. Response: OAM

During the time of the review the information provided indicates that these tanks are one line, and therefore, considered as one facility. Since it was indicated in your comment no. 1 that these tanks are capable of blending different amount of products, and are presumably not one line, then they will be treated as separate facilities and each will be given a limit of 2 tons of VOC per month. The five (5) tanks will have an emissions limit of 2 tons per month each, which will give a total VOC emissions of 120 tons per year, exceeding the FESOP limit. Therefore, each tank VOC limit will be truncated, in order to stay at 99 tons per year of VOC, and each tank limit will be 19.8 tons per year each. See calculations below.

$$24 \text{ ton/yr} * 5 \text{ tanks} = 120 \text{ ton/yr}$$

$$\begin{aligned} \text{Each tank limit} &= 24 \text{ ton/yr} / 120 \text{ ton/yr} * (99 \text{ ton/yr}) \\ &= 19.8 \text{ ton/yr of VOC emissions} \end{aligned}$$

$$\begin{aligned} 2\% \text{ loss of VOC input} &= 19.8 \text{ tons/yr} \\ \text{VOC input limit} &= 990 \text{ tons/yr} / 12 \text{ months} \\ &= 82.5 \text{ ton/month} \end{aligned}$$

The VOC input usage will not be changed to VOC emissions limit, because restriction has to be effective and enforceable in a practical matter. However, condition D.1.1 and D.2.6 will be revised to account for the 2% loss from the VOC input, in order for each tank to emit a VOC emissions of 19.8 tons per year. Conditions D.1.1 and D.2.6 will be revised as follows:

From:

D.1.1 BACT Minor Limitation

The volatile organic compounds (VOC) input usage from: (a) blending tank A shall not exceed 2.0 tons per month, and (b) blending tanks B and C shall not exceed a combined VOC input usage of 2.0 tons per month.

The resultant VOC emissions shall be determined based on 100% flash off of the 2% loss from the VOC material usage. Compliance with this condition will make the requirements of 326 IAC 8-1-6, Best Available Control Technology (BACT) not applicable.

To:

D.1.1 BACT Minor Limitation

The volatile organic compounds (VOC) input usage from the following blending tanks shall be limited as follows:

- (a) blending tank A shall not exceed 82.5 tons per month,
- (b) blending tank B shall not exceed 82.5 tons per month, and
- (c) blending tank C shall not exceed 82.5 tons per month.

Each blending tank VOC input limit will result in a VOC emissions of 1.65 tons per month, or a 2% loss of the VOC input limit. Compliance with this condition will make the requirements of 326 IAC 8-1-6, Best Available Control Technology (BACT) not applicable.

From:

D.2.6 BACT Minor Limitation

The volatile organic compounds (VOC) input usage from blending tanks E and F shall each be limited to 2.0 tons per month. Compliance with this condition will make the requirements of 326 IAC 8-1-6, Best Available Control Technology (BACT) not applicable.

Resultant VOC emission in this condition and condition D.2.7 shall be determined based on 100% flash off of the 2% loss from the VOC material usage.

To:

D.2.6 BACT Minor Limitation

The volatile organic compounds (VOC) input usage from the following blending tanks shall be limited as follows:

- (a) blending tank E shall not exceed 82.5 tons per month,
- (b) blending tank F shall not exceed 82.5 tons per month, and

Each blending tank VOC input limit will result in a VOC emissions of 1.65 tons per month, or a 2% loss of the VOC input limit . Compliance with this condition will make the requirements of 326 IAC 8-1-6, Best Available Control Technology (BACT) not applicable.

4. Comment: Chem Tech, Inc.

The Technical Support Document under section for Permitted Units and Pollution Control Equipment should state the corrected blending capability of tanks B and C.

4. Response: OAM

This correction is noted in this Addendum to the Technical Support Document, and is not necessary to change the Technical Support Document. All necessary corrections on the TSD will be noted on this Addendum.

5. Comment: Chem Tech, Inc.

We do not believe any of the calculations as shown in this table are indicative of our operations or its emissions potential. We are not certain how these calculations were derived. Consequently we are concerned regarding how these calculations could affect our overall permit application and reporting requirement.

5. Response: OAM

Under Emission Calculations on (A) page 2 of 8 of the TSD, an explanation and methodology on how the calculation was made is included.

6. Comment: Chem Tech, Inc.

The propellant can filling operation was not stated in the permit although it was stated in the Technical Support Document .

6. Response: OAM

The propellant can filling was overlooked, and it will be included in the section of the unpermitted facilities.

The OAM has decided to make the following changes to the FESOP:

1. The proposed B.13 Preventive Maintenance Plan is revised to reflect the latest version.
(Changes are bolded for emphasis)

From:

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:

- (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;
- (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
- (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
- (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

To:

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) **If required by specific condition(s) in Section D of this permit**, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units **and associated emission control devices**;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

2. The proposed B.19 Minor Permit Modification is revised to reflect the latest version

From:

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A minor modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

To:

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F), **except as provided by 326 IAC 2-8-11(c)**.
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application **provided that the change has received any approval required by 326 IAC 2-1**. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]