

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Avery Dennison - Fasson Roll Division
3011 Independence Drive
Fort Wayne, Indiana 46808**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T003-7451-00196	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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(15)]

The Permittee owns and operates a stationary pressure sensitive paper coating and laminating operation.

Responsible Official: Doug McKinzie
Source Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
SIC Code: 2672
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) Two (2) pressure sensitive paper coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of 400 and 418 billion square inches per year, FW1 exhausting to ten (10) stacks (A, C, D, E, F, G, M, BB, ZI-3 and ZE-1) and FW2 exhausting to nineteen (19) stacks (B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4), consisting of the following equipment:
 - (A) One (1) flow coating operation; and
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;
- (2) One (1) natural gas fired Cleaver Brooks boiler, constructed in 1995, identified as B-3, with maximum heat input capacity of 10.2 million British thermal units per hour (mmBtu/hr); exhausting to one (1) stack (B-3).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (1) Two (2) natural gas fired boilers, constructed in 1984 and 1986, identified as B-1 and B-2, each with maximum heat input capacity of 5.23 million British thermal units per hour (mmBtu/hr), each exhausting to one (1) stack (B-1 and B-2);
- (2) Four (4) cold cleaner degreasing operations;

- (3) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons;
- (4) One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;
- (5) Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;
- (6) One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and
- (7) Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 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, 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 2-7-5(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 2-7-7(a)]

- (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 2-7-10] [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.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(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. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(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; or
 - (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.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (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) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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, OAM, on or before the date it is due.
- (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 based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

- (5) Any insignificant activity that has been added without a permit revision;
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 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, except as provided in 326 IAC 2-7-16.
- (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 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, 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 Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (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 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4-(c)(9) 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 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM 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.
- (d) 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.

- (e) 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.
- (f) 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).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps 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) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 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 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)]
- (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 2-7-9(a)(3)]
- (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 2-7-9(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, 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 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM 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(40).

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, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) 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) 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, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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, 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 being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (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.20 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 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)(D)(i) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) 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) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) 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 by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(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, 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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(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 Part 70 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 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (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 Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour 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 5-1-3 (Temporary Exemptions), 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 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. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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

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 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in 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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

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

Compliance with applicable requirements shall be documented as required by this permit. 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 may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), 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.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient.

The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

- (c) The annual emission statement 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, OAM on or before the date it is due.

C.15 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, 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) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, 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 stated in (a) above.

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

- (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 for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (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 preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and 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
- (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, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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 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.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) Two (2) pressure sensitive paper coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of 400 and 418 billion square inches per year, FW1 exhausting to ten (10) stacks (A, C, D, E, F, G, M, BB, ZI-3 and ZE-1) and FW2 exhausting to nineteen (19) stacks (B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4), consisting of the following equipment:
 - (A) One (1) flow coating operation; and
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;

Insignificant Activities:

- (IA1) Four (4) cold cleaner degreasing operations;
- (IA2) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.
- (IA3) One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;
- (IA4) Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;
- (IA5) One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and
- (IA6) Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water delivered to the coating applicator.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to this 40 CFR 60.442, Subpart RR, when the pressure sensitive paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for one calendar month.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the flow coating operation.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.1.1, D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.7 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 (Construction Permit Requirements) may require these facilities to have monitoring requirements.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1), (2), (4), and (5) shall be taken monthly. Records maintained for (3) shall be taken daily as needed. All records maintained shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records may include purchase orders, invoices, production data or material safety data sheets (MSDS) as necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of usage each month and logs of the dates of use when using non-compliant coatings;
 - (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by the use of the following equation to calculate daily volume weighted average:
$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{3C}$$

Dc = density of coating, lb/gal Dw = density of water, lb/gal
O = weight percent organics, % Q = quantity of coating, gal/unit
W = percent volume water, % C = total of coatings used, gal/unit;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) The Permittee shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of the source.
- (c) Pursuant to 40 CFR 60.445, the Permittee shall maintain the following records:
- (1) A calendar month record of all coatings used and the results of the manufacturer's formulation data.
 - (2) A calendar month record of the amount of solvent applied in the coating facility.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 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 OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (2) One (1) natural gas fired Cleaver Brooks boiler, constructed in 1995, identified as B-3, with maximum heat input capacity of 10.2 million British thermal units per hour (mmBtu/hr); exhausting to one (1) stack (B-3).
- (Insignificant Activity) Two (2) natural gas fired boilers, constructed in 1984 and 1986, identified as B-1 and B-2, each with maximum heat input capacity of 5.23 million British thermal units per hour (mmBtu/hr), each exhausting to one (1) stack (B-1 and B-2);

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the one (1) 5.23 million British thermal units per hour natural gas fired boiler identified as B-1 (Insignificant Activity), constructed in 1984 shall be limited to 0.6 pounds per million British thermal unit, the one (1) 5.23 million British thermal units per hour natural gas fired boiler identified as B-2 (Insignificant Activity), constructed in 1986 shall be limited to 0.59 pounds per million British thermal unit and the one (1) 10.2 million British thermal units per hour natural gas fired boiler identified as B-3, constructed in 1995 shall be limited to 0.49 pounds per million British thermal unit. These limitations were based on the following equation:

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

where:

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

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 mmBtu/hr, Pt shall not exceed 0.6.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.2.3 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

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

D.2.4 Record Keeping Requirements

Pursuant to 40 CFR 60.40C, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record for the one (1) 10.2 million British thermal units per hour (mmBtu/hr) boiler identified as B-3.

D.2.5 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the one (1) 10.2 million British thermal unit per hour (mmBtu/hr) natural gas fired boiler identified as B-3.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Avery Dennison - Fasson Roll Division
Source Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-7451-00196

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 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Avery Dennison - Fasson Roll Division
Source Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-7451-00196

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Avery Dennison - Fasson Roll Division
Source Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-7451-00196

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

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:

Date:

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

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-7451-00196
Facility: One (1) flow coating operation
Parameter: Volatile Organic Compound (VOC)
Limit: 45 Megagrams per year (equivalent to 49.6 tons per year). When exceeded, input VOC shall be equal to or less than 0.20 kg VOC per kg coating solids.

YEAR: _____

Month	VOC usage this month (tons)	VOC usage last 11 months (tons)	VOC usage last 12 months (tons)	Kg VOC per kg coating solids (when applicable)

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

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

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

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Avery Dennison - Fasson Roll Division
Source Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-7451-00196

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name: Avery Dennison - Fasson Roll Division
Source Location: 3011 Independence Drive, Fort Wayne, Indiana 46808
County: Allen
SIC Code: 2672
Operation Permit No.: T003-7451-00196
Permit Reviewer: Cathie Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Avery Dennison - Fasson Roll Division relating to the operation of paper coating and laminating operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) Two (2) surface coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of 30,275 and 30,276 square meters per hour, FW1 exhausting to seven (7) stacks (A-G) and FW2 exhausting to eight (8) stacks (HH-N), consisting of the following equipment:
 - (A) One (1) flow coating operation, with maximum capacity of 60,551 square meters of pressure sensitive coating paper per hour;
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;
 - (C) Four (4) cold cleaner degreasing operations;
 - (D) One (1) water based emulsion mixing operation, using dry filters as control; and
 - (E) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.
- (2) One (1) natural gas fired Cleaver Brooks boiler, constructed in 1995, identified as B-3, with maximum heat input capacity of 10.2 million British thermal units per hour (mmBtu/hr); exhausting to one (1) stack (B-3).

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Two (2) natural gas fired boilers, constructed in 1984 and 1986, identified as B-1 and B-2, each with maximum heat input capacity of 5.23 million British thermal units per hour (mmBtu/hr), each exhausting to one (1) stack (B-1 and B-2);
- (2) Three (3) natural gas fired air makeup units, with heat input capacity of 2.0, 2.0 and 2.9 million British thermal units per hour;
- (3) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (4) Combustion source flame safety purging on startup;
- (5) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (6) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (8) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (9) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured as 20 degrees C (68 degrees F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (10) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (11) Closed loop heating and cooling systems;
- (12) Infrared cure equipment;
- (13) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (14) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (15) Forced and induced draft cooling tower system not regulated under a NESHAP;
- (16) Heat exchanger cleaning and repair;
- (17) Process vessel degassing and cleaning to prepare for internal repairs;
- (18) Paved and unpaved roads and parking lots with public access;

- (19) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (20) 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;
- (21) Blowdown for any of the following: sight glass, boiler, compressors, and cooling tower;
- (22) Stationary fire pumps;
- (23) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (24) Silicone Batching; and
- (25) One (1) 20 foot natural gas fired silicone dryer, with maximum heat input capacity of 5.18 million British thermal units per hour (mmBtu/hr).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Construction Permit CP003-3218-00196, issued January 18, 1995.
- (2) Exemption CP003-6235-00196, issued August 5, 1996.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 Part 70 permit application for the purposes of this review was received on December 11, 1996.

A notice of completeness letter was mailed to the source on January 17, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (one (1) page).

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	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

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

HAP's	Potential Emissions (tons/year)
Vinyl Acetate	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of Volatile Organic Compound (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 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) 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) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the source's 1995 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.08
PM-10	0.08
SO ₂	0.04
VOC	36.99
CO	0.32
NO _x	0.20
HAP (Vinyl Acetate)	36.99

County Attainment Status

The source is located in Allen County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) 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. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The two (2) natural gas fired boilers, each with heat input capacity of 5.23 mmBtu/hr, constructed in 1984 and 1986 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because their heat input capacities are less than ten (10) mmBtu/hr.
- (b) The one (1) natural gas fired boiler, with heat input capacity of 10.2 mmBtu/hr is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because it was constructed in 1995 and the heat input capacity is greater than ten (10) million British thermal units per hour (mmBtu/hr). Pursuant to this subpart, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record.
- (c) The two (2) surface coating operations are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR) because they were constructed in 1984 and 1986 which is after the December 30, 1980 applicability date. Pursuant to this subpart:
- (1) The paper/pressure sensitive tape and label coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for one calendar month.
- A compliance test performed according to EPA Method 8260A shall determine compliance with this requirement.
- (2) A compliance performance test must be conducted within 60 days after achieving maximum production rates, but no later than 180 days after initial start-up. The performance test shall be conducted utilizing EPA Method 8260A, or methods acceptable to the Commissioner, to demonstrate VOC content in the water based coating.
- (d) The three (3) waterbased emulsion storage tanks are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb) because their storage capacities are greater than forty (40) cubic meters, but less than seventy-five (75) cubic meters and they were constructed in October 1984 which is after the July 23, 1984 applicability date. Pursuant to 40 CFR 60.116b (a) and (b):

- (1) The Permittee shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of the source.
- (e) The four (4) cold cleaner degreasers are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63.460 Subpart T because they do not use any of the solvents listed in this subpart.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plan), the source is required to submit a Preventive Maintenance Plan (PMP) for the one (1) flow coating operation and for the one (1) 10.2 million British thermal units per hour natural gas fired boiler.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 11, 1996 with the Part 70 Permit Application. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the potential VOC emissions are less than two hundred fifty (250) tons per year and it is not one of the 28 listed categories in this rule.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compound (VOC). 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 July 1 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).

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

326 IAC 8-2-5 (Paper Coating Operations)

The two (2) flow coating operations are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because they were constructed in 1984 and 1986 which is after the January 1, 1980 applicability date and their potential VOC emissions are greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the VOC content of the coatings applied to labels of any substrate, pressure sensitive tapes, paper, plastic or metal foil by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating delivered to the applicator less water.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement. See page one (1) of one (1) TSD, App A.

326 IAC 8-3-2 (Cold Cleaner Degreaser Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The degreasing operations (Insignificant Activity) are not subject to the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreasing Operations and Control) because it was constructed prior to the July 1, 1990 applicability date for Allen County.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The three (3) waterbased emulsion storage tanks are not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is not located in any of the listed counties in this rule.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the water based emulsion mixing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

For the water based emulsion mixing operation:

P = 250 pounds per hour = 0.125 tons per hour

E = 1.02 pounds PM per hour

The dry filters shall be in operation at all times the water based emulsion operation is in operation, in order to comply with this limit.

326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d))

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the one (1) 5.23 million British thermal units per hour natural gas fired boiler identified as B-1 (Insignificant Activity), constructed in 1984 shall be limited to 0.6 pounds per million British thermal unit, the one (1) 5.23 million British thermal units per hour natural gas fired boiler identified as B-2 (Insignificant Activity), constructed in 1986 shall be limited to 0.59 pounds per million British thermal unit and the one (1) 10.2 million British thermal units per hour natural gas fired boiler identified as B-3, constructed in 1995 shall be limited to 0.49 pounds per million British thermal unit. These limitations were based on the following equation:

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

where:

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

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 mmBtu/hr, Pt shall not exceed 0.6.

(a) For boiler B-1, constructed in 1984:

Q = 5.23 mmBtu/hr

Pt = 0.70 lb/mmBtu

Since 0.70 is greater than 0.6, the boiler shall be limited to 0.6 lb/mmBtu.

The boiler is in compliance when using natural gas by the following equation:

12.0 lb/MMCF , to convert this to lb/mmBtu = $12.0 \text{ lb/MMCF} * \text{MMCF} / 1,000 \text{ mmBtu} = 0.0120 \text{ lb/mmBtu}$

$0.0120 \text{ lb/mmBtu} < 0.6 \text{ lb/mmBtu}$, therefore the boiler is in compliance.

(b) For boiler B-2, constructed in 1988:

Q = $5.23 + 5.23 = 10.46 \text{ mmBtu/hr}$

Pt = 0.59 lb/mmBtu

The boiler is in compliance when using natural gas by the following equation:

13.7 lb/MMCF , to convert this to lb/mmBtu = $13.7 \text{ lb/MMCF} * \text{MMCF} / 1,000 \text{ mmBtu} = 0.0137 \text{ lb/mmBtu}$

$0.0137 \text{ lb/mmBtu} < 0.59 \text{ lb/mmBtu}$, therefore the boiler is in compliance.

(c) For boiler B-3, constructed in 1995:

Q = $5.23 + 5.23 + 10.2 = 20.66 \text{ mmBtu/hr}$

Pt = 0.49 lb/mmBtu

The boiler is in compliance when using natural gas by the following equation:

13.7 lb/MMCF , to convert this to lb/mmBtu = $13.7 \text{ lb/MMCF} * \text{MMCF} / 1,000 \text{ mmBtu} = 0.0137 \text{ lb/mmBtu}$

$0.0137 \text{ lb/mmBtu} < 0.49 \text{ lb/mmBtu}$, therefore the boiler is in compliance.

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The water based emulsion mixing operation has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

This monitoring conditions is necessary because the dry filters for the water based emulsion mixing operation must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) 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) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) 326 IAC 2-1-3.4 (New Source Toxics Rule) does not apply to this source because there are no new emission units.

Conclusion

The operation of this paper coating and laminating operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T003-7451-00196**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Avery Dennison - Fasson Roll Division
Source Location: 3011 Independence Drive, Fort Wayne, Indiana 46808
County: Allen
SIC Code: 2672
Operation Permit No.: T003-7451-00196
Permit Reviewer: Cathie Moore

On February 25, 1998, the Office of Air Management (OAM) had a notice published in the Fort Wayne Journal Gazette/News Sentinel, Fort Wayne, Indiana, stating that Avery Dennison - Fasson Roll Division had applied for a Part 70 Operating Permit to operate a paper coating and laminating operation. 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 February 23, 1998, March 20, 1998, April 6, 1998 and May 26, 1998, Vipul Shah of Avery Dennison - Fasson Roll Division submitted comments on the proposed Part 70 Permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

Please change the equipment description in Condition A.2 "Emission Units and Pollution Control Equipment Summary" and Section D.1 "FACILITY OPERATION CONDITIONS" from square meters per hour to square meters per year. Also, there are two (2) additional stacks venting from FW1.

Response to Comment 1:

Condition A.2(1) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (1) Two (2) ~~surface~~ **pressure sensitive paper** coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of ~~30,275~~ **400** and ~~30,276~~ **418 billion square meters inches per hour year**, FW1 exhausting to ~~seven (7)~~ **ten (10)** stacks (~~A, G, A, C, D, E, F, G, M, BB, ZI-3 and ZE-1~~) and FW2 exhausting to ~~eight (8)~~ **nineteen (19)** stacks (~~HH-N, B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4~~), consisting of the following equipment:
 - (A) One (1) flow coating operation, ~~with maximum capacity of 60,551 square meters of pressure sensitive coating paper per hour~~, and
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;
 - ~~(C) Four (4) cold cleaner degreasing operations;~~
 - ~~(D) One (1) water based emulsion mixing operation; and~~

~~(E) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.~~

The equipment listed in Section D.1(1) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

(1) Two (2) ~~surface pressure sensitive paper~~ coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of ~~30,275 400~~ and ~~30,276 418 billion~~ square ~~meters inches~~ per ~~hour year~~, FW1 exhausting to ~~seven (7)~~ **ten (10)** stacks (~~A, C, D, E, F, G, M, BB, ZI-3 and ZE-1~~) and FW2 exhausting to ~~eight (8)~~ **nineteen (19)** stacks (~~HH, N, B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4~~), consisting of the following equipment:

(A) One (1) flow coating operation, ~~with maximum capacity of 60,551 square meters of pressure sensitive coating paper per hour; and~~

(B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;

Insignificant Activities:

(IA1) Four (4) cold cleaner degreasing operations;

~~(D) One (1) water based emulsion mixing operation; and~~

(IA2) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.

(IA3) **One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;**

(IA4) **Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;**

(IA5) **One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and**

(IA6) **Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.**

There are no changes to any other conditions or emission calculations due to this revision.

The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after Public Notice. The changes are noted here in the Addendum.

Comment 2:

Condition D.1.6 "Testing Requirements" - please take this condition out. This test is not required by the NSPS, rather Method 24. This should be a Compliance Monitoring Requirement rather than a Compliance Determination Requirement. Also, Condition C.8 "Performance Testing" and Condition C.15 "Actions Related to Noncompliance Demonstrated by a Stack Test" are not applicable to this source because there is no performance testing specified in Section D.

Response to Comment 2:

Condition D.1.6 (now Condition D.1.5) "Testing Requirements" has been changed to be as follows to remove the testing requirement since the source requests to stay below the NSPS threshold level:

D.1.65 Testing Requirements [326 IAC IAC 2-7-6(1), (6)]

~~A compliance performance test must be conducted within 60 days after achieving maximum production rates, but no later than 180 days after initial start-up. The performance test shall be conducted utilizing EPA Method 8260A, or methods acceptable to the Commissioner, to demonstrate VOC content in the water based coating.~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.1.1, D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Condition C.15 (now renumbered Condition C.13) "Actions Related to Noncompliance Demonstrated by a Stack Test" will not be removed because the source does, in fact, have testing requirements. If noncompliance was determined due to this test, the source shall follow the guidelines specified in this condition.

Comment 3:

Technical Support Document (TSD), "Compliance Monitoring Requirements", Condition D.1.8 "Particulate Matter" and Condition D.1.9 "Monitoring" - there are no dry filters used in the two (2) surface coating operations. Please remove these conditions as they are not applicable.

Response to Comment 3:

The water based emulsion mixing operation has been deemed insignificant, it has been deleted from Condition A.2 "Emission Units and Pollution Control Equipment Summary". Since there are no applicable requirements to this specific operation it has not been specified in Condition A.3 "Specifically Regulated Insignificant Activities".

Condition D.1.8 "Particulate Matter" and Condition D.1.9 "Monitoring" have been deleted from the final permit and replaced as follows. The remaining conditions in this section have been renumbered:

~~D.1.8 Particulate Matter (PM)~~

~~Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when the water based emulsion mixing operation is in operation.~~

~~D.1.9 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.1.7 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 (Construction Permit Requirements) may require these facilities to have monitoring requirements.

Comment 4:

Technical Support Document (TSD), page 7, first paragraph - change spray booth to flow coating operation.

Response to Comment 4:

The Technical Support Document (TSD), State Rule Applicability - Individual Facilities, 326 IAC 8-2-5 (Paper Coating Operations) should be changed to be as follows. However, the TSD is not physically changed after Public Notice. The changes are noted here in the Addendum:

326 IAC 8-2-5 (Paper Coating Operations)

The two (2) flow coating operations are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because they were constructed in 1984 and 1986 which is after the January 1, 1980 applicability date and their potential VOC emissions are greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the VOC content of the coatings applied to labels of any substrate, pressure sensitive tapes, paper, plastic or metal foil by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating delivered to the applicator less water.

Based on the MSDS submitted by the source and calculations made, the ~~spray booth is two (2)~~ **pressure sensitive paper operations are** in compliance with this requirement. See page one (1) of one (1) TSD, App A.

Comment 5:

Condition D.1.10(b) "Record Keeping Requirements" - please take out this condition since this surface coating operation does not have any dry filters.

Response to Comment 5:

Subsection (b) of Condition D.1.10 (now renumbered Condition D.1.8) "Record Keeping Requirements" has been deleted from the final permit. The remaining subsections of this condition have been re-lettered.

~~(b) To document compliance with Condition D.1.8 and D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

Comment 6:

Condition A.2 "Emission Units and Pollution Control Equipment Summary" - Items (c), (d), and (e) should be insignificant activities.

Response to Comment 6:

OAM agrees that these items are insignificant activities. Condition A.2(1) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (1) Two (2) ~~surface pressure sensitive paper~~ coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of ~~30,275~~ **400** and ~~30,276~~ **418 billion square meters inches** per hour year, FW1 exhausting to ~~seven (7)~~ **ten (10)** stacks (~~A, C, D, E, F, G, M, BB, ZI-3 and ZE-1~~) and FW2 exhausting to ~~eight (8)~~ **nineteen (19)** stacks (~~HH-N B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4~~), consisting of the following equipment:
 - (A) One (1) flow coating operation, ~~with maximum capacity of 60,551 square meters of pressure sensitive coating paper per hour; and~~
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;
 - ~~(C) Four (4) cold cleaner degreasing operations;~~
 - ~~(D) One (1) water based emulsion mixing operation; and~~
 - ~~(E) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.~~

Condition A.3 "Specifically Regulated Insignificant Activities" has been changed to be as follows to incorporate the insignificant activities:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (1) Two (2) natural gas fired boilers, constructed in 1984 and 1986, identified as B-1 and B-2, each with maximum heat input capacity of 5.23 million British thermal units per hour (mmBtu/hr), each exhausting to one (1) stack (B-1 and B-2);
- (2) **Four (4) cold cleaner degreasing operations;**
- (3) **Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons;**
- (4) **One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;**
- (5) **Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;**
- (6) **One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and**
- (7) **Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.**

The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (1) Two (2) ~~surface~~ **pressure sensitive paper** coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of ~~30,275~~ **400** and ~~30,276~~ **418 billion square meters inches per hour year**, FW1 exhausting to ~~seven (7)~~ **ten (10)** stacks (~~A, C, D, E, F, G, M, BB, ZI-3 and ZE-1~~) and FW2 exhausting to ~~eight (8)~~ **nineteen (19)** stacks (~~HHH, B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4~~), consisting of the following equipment:
- (A) One (1) flow coating operation, ~~with maximum capacity of 60,551 square meters of pressure sensitive coating paper per hour; and~~
- (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;

Insignificant Activities:

- (IA1) Four (4) cold cleaner degreasing operations;
~~(D) One (1) water based emulsion mixing operation; and~~
- (IA2) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.
- (IA3) **One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;**
- (IA4) **Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;**
- (IA5) **One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and**
- (IA6) **Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.**

The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after Public Notice. The changes are noted here in the Addendum.

There are no changes to any other conditions as a result of this equipment description change.

Comment 7:

Condition C.6 "Operation of Equipment" - there is no control equipment at this source. Please delete this condition.

Response to Comment 7:

Condition C.6 "Operation of Equipment" will not be removed, even though this source does not have any control equipment at this time. Since the condition states "as specified in Section D of this permit" and there are no control equipment requirements in Section D, this condition would not be applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has control equipment, the source will be aware of their responsibilities for the control equipment. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

Comment 8:

Condition C.2 "Opacity" is not applicable to this source, please delete this condition.

Response to Comment 8:

The rule cited in Condition C.2 "Opacity" is 326 IAC 5-1-2 (Opacity). This condition is applicable to any facility that has the potential to emit particulate matter (PM) and the rule does not specify any significant level. For this source the natural gas-fired boilers and some insignificant activities have potential particulate matter (PM) emissions. Therefore, these facilities would be subject to the requirements of 326 IAC 5-1-2 (Opacity). Also, natural gas facilities may substitute the Natural Gas Certification with a Visible Emissions Certification. There will be no changes to this condition in the final permit due to this comment.

Comment 9:

Condition C.19(a) "General Reporting Requirements" - can we submit the compliance report semiannually rather than quarterly?

Response to Comment 9:

Quarterly Compliance Reporting is required to document compliance with the permit requirements listed in this permit. 326 IAC 2-7-5(3)(C)(i) gives IDEM the authority to require reports "at least" every six months. The Office of Air Management feels that if reporting was only submitted semiannually, the possibility for a malfunction of the facilities would not be detected soon enough and would lead to a deviation from the permit requirements. There will be no changes to this condition in the final permit due to this comment.

Comment 10:

Condition D.1.2 "Volatile Organic Compound" - please change 40 CFR 60.440 to 40 CFR 60.442.

Response to Comment 10:

1. This is a typographical error, therefore, Condition D.1.2 "Volatile Organic Compound" has been changed to be as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to this 40 CFR ~~60.440~~ **60.442**, Subpart RR, **when the paper/pressure sensitive tape and label paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation** shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for one calendar month ~~for the flow coating operation.~~

2. Condition D.1.8(c) "Record Keeping Requirements" has been added to the final permit as follows. The remaining subsections of this condition have been re-lettered:

(c) Pursuant to 40 CFR 60.445, the Permittee shall maintain the following records:

- (1) A calendar month record of all coatings used and the results of the manufacturer's formulation data.**
- (2) A calendar month record of the amount of solvent applied in the coating facility.**

3. Also, Condition D.1.9 "Reporting Requirements" has been added to the permit as follows:

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 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.

4. A quarterly report has been added to the end of the permit as required by Condition D.1.9 "Reporting Requirements" as follows:

YEAR: _____

Month	VOC usage this month (tons)	VOC usage last 11 months (tons)	VOC usage last 12 months (tons)	Kg VOC per kg coating solids (when applicable)

Comment 11:

Condition D.1.5 "Preventive Maintenance Plan" - please reword condition to say "the flowcoating operation" rather than "facility" and delete "and any control devices", since we do not have any control device for this operation.

Response to Comment 11:

OAM agrees with the recommendation. Therefore, Condition D.1.5 (now renumbered Condition D.1.4) "Preventive Maintenance Plan" has been changed to be as follows:

D.1.54 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility and any control devices~~ **the flow coating operation.**

Comment 12:

Condition D.1.10(a) "Record Keeping Requirements" - please take out the last sentence of (1), (2) (log of dates of use), (3) (volume weighted VOC content) and (4) (cleanup solvent usage).

Response to Comment 12:

1. Since solvent is added to the coatings before they are applied to the flowcoating operation, the usage of solvent added to the coatings is needed to ensure compliance with 326 IAC 8-2-5 (Paper Coating Operations) and 40 CFR 60.442, Subpart RR. Therefore, item (4) (now renumbered as (3)) and the last sentence of (1) can not be removed from this condition in the final permit.

2. The requirement to maintain daily solvent usage records is necessary to prove that the source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), because emissions are below two hundred fifty (250) tons per year. Reporting of this information is not required but the records shall be kept so that reporting can be submitted upon request of OAM.
3. The calculation of daily volume weighted average of the coatings used, is a method of compliance with 326 IAC 8-2-5 (Paper Coating Operations) that should be used to show compliance on any day that any coating with a VOC content of greater than 2.9 pounds per gallon is used.
4. However, in regards to the other requests of this comment, Condition D.1.10(a) (now renumbered Condition D.1.8(a)) "Record Keeping Requirements" has been changed to be as follows:
 - (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~(5) below. Records maintained for (1), ~~through (2), (4), and (5)~~(6) shall be taken monthly. **Records maintained for (3) shall be taken daily as needed. All records maintained and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.**
 - (1) The amount and VOC content of each coating material and solvent used. Records ~~shall~~ **may** include purchase orders, invoices, **production data and or** material safety data sheets (MSDS) **as** necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of ~~the dates of use~~ **usage each month and logs of the dates of use when using non-compliant coatings;**
 - (3) The volume weighted VOC content of the coatings used for each ~~month~~ **day that any coating with VOC content greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by the use of the following equation to calculate daily volume weighted average:**
$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{3C}$$

Dc = density of coating, lb/gal	Dw = density of water, lb/gal
O = weight percent organics, %	Q = quantity of coating, gal/unit
W = percent volume water, %	C = total of coatings used, gal/unit;
 - ~~(4)~~ The cleanup solvent usage for each month;
 - ~~(5)~~(4) The total VOC usage for each month; and
 - ~~(6)~~(5) The weight of VOCs emitted for each compliance period.

Comment 13:

Section D.1 "FACILITY OPERATION CONDITIONS" - there are more tanks that were not originally listed on the permit application. Please include the following tanks in the final permit:

- Tank 1, storing water based emulsion, capacity: 15,000 gallons
- Tank 5, storing water based emulsion, capacity: 15,954 gallons
- Tank 6, storing water based emulsion, capacity: 15,954 gallons

Tank 7, storing water based emulsion, capacity: 15,954 gallons
Tank 9, storing water based emulsion, capacity: 15,954 gallons
Tank 10, storing water based emulsion, capacity: 15,954 gallons
Tank 15, storing water based emulsion, capacity: 12,000 gallons
Tank 16, storing water based emulsion, capacity: 13,152 gallons
Tank 19, storing water based emulsion, capacity: 13,152 gallons

Response to Comment 13:

Condition A.3 "Specifically Regulated Insignificant Activities" has been changed to be as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (1) Two (2) natural gas fired boilers, constructed in 1984 and 1986, identified as B-1 and B-2, each with maximum heat input capacity of 5.23 million British thermal units per hour (mmBtu/hr), each exhausting to one (1) stack (B-1 and B-2);
- (2) **Four (4) cold cleaner degreasing operations;**
- (3) **Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons;**
- (4) **One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;**
- (5) **Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;**
- (6) **One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and**
- (7) **Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.**

The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (1) Two (2) ~~surface pressure sensitive paper~~ coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of ~~30,275~~ **400** and ~~30,276~~ **418 billion** square ~~meters inches~~ per ~~hour year~~, FW1 exhausting to ~~seven (7)~~ **ten (10)** stacks (~~A, C, D, E, F, G, M, BB, ZI-3 and ZE-1~~) and FW2 exhausting to ~~eight (8)~~ **nineteen (19)** stacks (~~HHN B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4~~), consisting of the following equipment:
- (A) One (1) flow coating operation, ~~with maximum capacity of 60,551 square meters of pressure sensitive coating paper per hour; and~~
- (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;

Insignificant Activities:

- (IA1) Four (4) cold cleaner degreasing operations;
~~(D) One (1) water based emulsion mixing operation; and~~
- (IA2) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.
- (IA3) **One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;**
- (IA4) **Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;**
- (IA5) **One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and**
- (IA6) **Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.**

These additional tanks are subject to 40 CFR 60.116b, Subpart Kb, because their storage capacities are greater than forty (40) cubic meters, but less than seventy-five (75) cubic meters and were constructed after July 23, 1984. However, there are no changes to any other conditions as a result of this change because Condition D.1.10(c) (now renumbered and re-lettered Condition D.1.9(b)) "Record Keeping Requirements" states that the Permittee will keep records of storage capacity and dimensions of all storage vessels.

Comment 14:

Technical Support Document, State Rule Applicability - Entire Source, 326 IAC 1-6-3 (Preventive Maintenance Plan) - please delete the requirement for the 10.2 mmBtu/hr boiler to have a PMP.

Response to Comment 14:

The Technical Support Document (TSD), State Rule Applicability - Entire Source, 326 IAC 1-6-3 (Preventive Maintenance Plan) should be changed as follows. However, the TSD is not physically changed after Public Notice. The changes are noted here in the Addendum:

326 IAC 1-6-3 (Preventive Maintenance Plan)

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plan), the source is required to submit a Preventive Maintenance Plan (PMP) for the one (1) flow coating operation ~~and for the one (1) 10.2 million British thermal units per hour natural gas fired boiler.~~

Comment 15:

Condition A.1 "General Information" - Please change the responsible official to Doug McKinzie.

Response to Comment 15:

Condition A.1 "General Information" has been changed to be as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary **pressure sensitive** paper coating and laminating operation.

Responsible Official: ~~William Lend~~ **Doug McKinzie**
Source Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
SIC Code: 2672
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

Comment 16:

Condition B.11 "Annual Compliance Certification" - request changing to certification once every five years.

Response to Comment 16:

Pursuant to 326 IAC 2-7-6(5)(A) (Compliance Requirements), the frequency of submissions of compliance certification shall be not less than annually. There will be no changes to this condition in the final permit due to this comment.

Comment 17:

Condition C.14 "Compliance Monitoring Plan - Failure to take Response Steps" - please delete this condition since we no longer have compliance monitoring requirements (Condition D.1.8 and D.1.9 should be deleted by Comment 3).

Response to Comment 17:

Condition C.14 "Compliance Monitoring Plan - Failure to take Response Steps" stated as follows has been deleted from the final permit. The remaining conditions in this section have been renumbered.

~~C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(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) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall~~

~~be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~

- ~~(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
 - ~~(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- ~~(b) For each compliance monitoring condition of this permit, appropriate response steps 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 response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- ~~(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~
- ~~(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) The Permittee has determined that the compliance monitoring 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 process has already returned to operating within "normal" parameters and no response steps are required.~~
- ~~(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.~~

Comment 18:

Condition C.13 "Emergency Reduction Plan" - please delete this conditions as our potential VOC emissions are less than one hundred (100) tons per year.

Response to Comment 18:

Upon calculation of source-wide potential volatile organic compound (VOC) emissions, it has been determined that the potential VOC emissions are just less than one hundred (100) tons per year because the degreasers were previously thought to be significant activities but have been determined to be insignificant. Therefore, this condition has been deleted from the final permit. However, any change or modification that would increase potential VOC emissions to greater than one hundred (100) tons per year for the entire source, would make the source applicable to this requirement. The remaining conditions in this section have been renumbered.

Comment 19:

Condition D.1.3 "Volatile Organic Compounds" - since the degreasers are insignificant, this condition should be deleted.

Response to Comment 19:

Even though the potential volatile organic compound (VOC) emissions from degreasers are insignificant, this condition is still applicable because there is no potential emissions applicability requirement listed in 326 IAC 8-3-2 (Cold Cleaner Degreaser Operation). Therefore, the condition cannot be removed. There will be no changes to this condition in the final permit due to this comment.

Comment 20:

Condition D.2.4 "Record Keeping Requirements" and Condition D.2.5 "Reporting Requirements" - please specify that this requirement is only for the 10.2 mmBtu/hr boiler (B-3) and not all boilers.

Response to Comment 20:

Condition D.2.4 "Record Keeping Requirements" has been changed to be as follows:

D.2.4 Record Keeping Requirements

Pursuant to 40 CFR 60.40C, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record **for the one (1) 10.2 million British thermal units per hour (mmBtu/hr) boiler identified as B-3.**

Condition D.2.5 "Reporting Requirements" has been changed to be as follows:

D.2.5 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the one (1) 10.2 million British thermal unit per hour (mmBtu/hr) natural gas fired boiler **identified as B-3.**

Comment 21:

Condition D.1.7 "Volatile Organic Compound" - please add "or ASTM 8260M" after "EPA Method 24"

Response to Comment 21:

Condition D.1.7 (now renumbered Condition D.1.6) "Volatile Organic Compound" has been changed to be as follows:

D.1.76 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 **or ASTM 8260M** in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Upon further review, the following changes were made to the final Part 70 Permit (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. The name in the signature block on the cover page has been changed from "Felicia R. George" to "**Janet G. McCabe**".
2. A "Source Summary" has been changed to be as follows:

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.~~ **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.**

3. Condition A.4 "Part 70 Permit Applicability" has been changed to be as follows:

~~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).**

4. Condition A.5 "Prior Permit Conditions Superseded" has been deleted as follows:

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

5. Condition B.1(b) "Permit No Defense" has been changed to be as follows:

- ~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

6. Condition B.8(c) "Duty to Supplement and Provide Information" has been changed to be as follows:

- ~~(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 to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee shall furnish such confidential records directly to the U.S. EPA along~~

with a claim of confidentiality under 40 CFR 2, Subpart B.

7. Condition B.11(c) "Annual Compliance Certification" has been changed to be as follows:

- (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 **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) **Any insignificant activity that has been added without a permit revision; and**
- ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8. Condition B.12 "Preventive Maintenance Plan" has been changed to be as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

9. Condition B.14 "Permit Shield" has been changed to be as follows:

B.14 Permit Shield [326 IAC 2-7-15]

- (a) **This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
- ~~(a)~~ (b) **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.**
Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided **that either of the following:**
 - (1) The applicable requirements are included and specifically identified in this permit; **or**
 - (2) ~~IDEM, OAM in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- ~~(b)~~ (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. 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM 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)~~ (d) **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM 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. 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.**
- ~~(d)~~ (e) 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)~~ (f) 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)~~ (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - ~~(g)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]
10. Condition B.16 "Deviations from Permit Requirements and Conditions" has been changed to be as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps 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) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**
 - (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
 - (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
 - (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
 - (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.**
- ~~(b)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
 - ~~(c)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

11. Condition B.18(a) "Permit Renewal" has been changed to be as follows:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM 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(40)**.

12. Condition B.19 "Administrative Permit Amendment", Condition B.20 "Minor Permit Modification", and Condition B.21 "Significant Permit Modification" have all been combined into one condition numbered Condition B.19 "Permit Amendment or Modification" as follows. The remaining conditions of this section have been renumbered:

~~B.19 Administrative Permit Amendment [326 IAC 2-7-11]~~

- ~~(a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).~~
- ~~(b) An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-7-11(c).~~
- ~~(c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.20 Minor Permit Modification [326 IAC 2-7-12]~~

- ~~(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.~~
- ~~(b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).~~
- ~~(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).~~
- ~~(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 2-7-12(b)(6)(A) through (C), 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 2-7-12(b)(7)]~~

~~B.21 Significant Permit Modification [326 IAC 2-7-12(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) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.~~

- ~~(c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.~~
- ~~(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.~~

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

13. Condition B.26 (now renumbered Condition B.24) “Inspection and Entry” has been changed to be as follows:

B.2624 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **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 Part 70 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 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]
14. Condition B.27(b) (now renumbered Condition B.25(b)) "Transfer of Ownership or Operation" has been changed to be as follows:
 - (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **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(34).**
15. Condition B.28 (now renumbered Condition B.26) "Annual Fee Payment" has been changed to be as follows:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

 - (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.~~
 - (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
 - (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~
16. Condition C.1 "PSD Minor Source Status" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~**C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**~~

 - ~~(a) The total source potential emissions of volatile organic compound (VOC) are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~
 - ~~(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.~~
17. Condition C.1 "Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

18. Condition C.2 "Opacity" has been changed to be as follows:

C.2 Opacity [326 IAC 5-1]

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

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~ **any one (1) six minute averaging period**, as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ 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.

19. Condition C.6 "Operation of Equipment" has been changed to be as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit(s) vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

20. Condition C.7 "Asbestos Abatement Projects- Accreditation" and Condition C.12 "Asbestos Abatement Projects" have been combined into one condition as follows:

~~C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [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 be accredited is federally enforceable.~~

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

21. Condition C.8 "Performance Testing" has been changed to be as follows:

C.8 Performance Testing ~~326 IAC 3-2-1~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in 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**

no later than thirty-five (35) days before prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

22. Condition C.9 "Compliance Schedule" has been changed to be as follows:

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

23. Condition C.10 "Compliance Monitoring" has been changed to be as follows:

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

Compliance with applicable requirements shall be documented as required by this permit. 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 **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

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

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the 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(34).

24. Condition C.11 "Monitoring Methods" has been changed to be as follows:

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

25. Condition C.12 "Risk Management Plan" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), 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.**

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

26. Condition C.13 “Actions Related to Noncompliance Demonstrated by a Stack Test” has been changed to be as follows:

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

27. Condition C.14(a) “Emission Statement” has been changed to be as follows:

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

28. The rule cite and (a) of Condition C.16 "General Record Keeping Requirements" has been changed to be as follows:

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

- (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 **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM representative, for a minimum of three (3) years. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

29. Condition C.17 "General Reporting Requirements" has been changed to be as follows:

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

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and 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

- (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, OAM on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
- ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
- ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

30. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (1) Two (2) ~~surface pressure sensitive paper~~ coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of ~~30,275 400~~ and ~~30,276 418 billion~~ square ~~meters inches~~ per ~~hour year~~, FW1 exhausting to ~~seven (7)~~ **ten (10)** stacks (~~A, C, D, E, F, G, M, BB, ZI-3 and ZE-1~~) and FW2 exhausting to ~~eight (8)~~ **nineteen (19)** stacks (~~HH-N B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4~~), consisting of the following equipment:
 - (A) One (1) flow coating operation, ~~with maximum capacity of 60,551 square meters of pressure sensitive coating paper per hour; and~~
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;

Insignificant Activities:

- (IA1) Four (4) cold cleaner degreasing operations;
~~(D) One (1) water based emulsion mixing operation; and~~
- (IA2) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.
- (IA3) **One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;**
- (IA4) **Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;**
- (IA5) **One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and**
- (IA6) **Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.**

31. Condition D.1.1 "Volatile Organic Compound" has been changed to be as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), ~~the VOC content of the coatings applied to labels of any substrate, pressure sensitive tapes, paper, plastic or metal foil by means of web coating shall be limited to no owner or operator of facility engaged in the surface coating of~~ **pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating delivered to the applicator less excluding water for the flow coating operation delivered to the coating applicator.**

32. Condition D.1.4 "Particulate Matter" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2 (Process Operations, the particulate matter (PM) from the water based emulsion mixing operation shall be limited by the following:~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

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

33. Condition D.1.6 (now renumbered Condition D.1.5) "Testing Requirements" has been changed to be as follows:

D.1.65 Testing Requirements [326 IAC 2-7-6(1), (6)]

~~A compliance performance test must be conducted within 60 days after achieving maximum production rates, but no later than 180 days after initial start-up. The performance test shall be conducted utilizing EPA Method 8260A, or methods acceptable to the Commissioner, to demonstrate VOC content in the water based coating.~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.1.1, D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

34. Condition D.1.7 (now renumbered Condition D.1.6) "Volatile Organic Compound" has been changed to be as follows:

D.1.76 Volatile Organic Compounds (VOC)

~~Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)(7) 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 or ASTM 8260M in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

35. The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (2) One (1) natural gas fired Cleaver Brooks boiler, constructed in 1995, identified as B-3, with maximum heat input capacity of 10.2 million British thermal units per hour (mmBtu/hr); exhausting to one (1) stack (B-3).
(Insignificant Activity) Two (2) natural gas fired boilers, constructed in 1984 and 1986, identified as B-1 and B-2, each with maximum heat input capacity of 5.23 million British thermal units per hour (mmBtu/hr), each exhausting to one (1) stack (B-1 and B-2);

36. Condition D.2.2 "Testing Requirements" has been changed to be as follows:

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

37. On the Certification Form, the line "Emergency/Deviation Occurrence Reporting Form" has been deleted.
38. On the Emergency/ Deviation Occurrence Reporting Form, the last sentence "Attach a signed certification to complete this report" has been deleted from the bottom of the second page.
39. The Quarterly Compliance Report is now called the Quarterly Compliance Monitoring Report, deleted the column marked "No Deviations", and change the language as shown in the following pages.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Avery Dennison - Fasson Roll Division
Address City IN Zip: 3011 Independence Drive, Fort Wayne, Indiana 46808
Part 70: T003-7451-00196
Plt ID: 003-00196
Reviewer: Cathie Moore
Date: 2/2/98**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
VCA	8.5	41.38%	41.1%	0.3%	41.1%	58.27%	0.01010	60551.000	0.05	0.03	16.63	399.23	72.86	0.00	0.05	100%
VCS	8.1	2.00%	0.0%	2.0%	0.0%	98.00%	0.00040	60551.000	0.16	0.16	3.92	94.05	17.16	0.00	0.17	100%

State Potential Emissions

Add worst case coating to all solvents

20.55

493.28

90.02

0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used