

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

**Syndicate Sales, Inc.
2025 North Wabash Street
Kokomo, Indiana 46901-2063**

(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 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F067-7699-00026	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	4
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	4
A.3	Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(l)]	4
A.4	FESOP Permit Applicability [326 IAC 2-8-2]	5
SECTION B	GENERAL CONDITIONS	6
B.1	Permit No Defense [326 IAC 2-1-10] [IC 13]	6
B.2	Definitions [326 IAC 2-8-1]	6
B.3	Permit Term [326 IAC 2-8-4(2)]	6
B.4	Enforceability [326 IAC 2-8-6]	6
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	6
B.6	Severability [326 IAC 2-8-4(4)]	6
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	6
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	6
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	7
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	7
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]	7
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	7
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]	8
B.14	Emergency Provisions [326 IAC 2-8-12]	8
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	10
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	10
B.17	Permit Renewal [326 IAC 2-8-3(h)]	11
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	12
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]	12
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	12
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]	13
B.22	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]	13
B.23	Operational Flexibility [326 IAC 2-8-15]	13
B.24	Construction Permit Requirement [326 IAC 2]	14
B.25	Inspection and Entry [326 IAC 2-8-5(a)(2)]	14
B.26	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]	15
B.27	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	15
B.28	Enhanced New Source Review [326 IAC 2]	15
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	16
C.2	Opacity [326 IAC 5-1]	16
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	16
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	16
C.5	Fugitive Dust Emissions [326 IAC 6-4]	17
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	17
C.7	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]	17
	Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-2.1]	17

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)] 17
C.10 Monitoring Methods [326 IAC 3] 18
C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140] 18

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215] 19
C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)] . . 19
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test 20

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

C.15 Monitoring Data Availability [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)] 21
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)] 21
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] 22

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1 23

SECTION D.1 FACILITY OPERATION CONDITIONS

Flow Coating Line 24

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-1-6] [326 IAC 2-2] . 24
D.1.2 Preventive Maintenance Plan [326 IAC 2-8-3(c)(6)] 24

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)] 24
D.1.4 Work Practices [326 IAC 8-1-6] 24
D.1.5 Volatile Organic Compounds (VOCs) 25

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

D.1.6 Record Keeping Requirements 25
D.1.7 Reporting Requirements 25

SECTION D.2 FACILITY OPERATION CONDITIONS

Metal Stamping Press Line 26

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8] [326 IAC 2-2] 26

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-8-5(1)] 26

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

D.2.3 Record Keeping Requirements 26

Certification Form 27

Emergency/Deviation Occurrence Report Form 28

Quarterly Report Form 30

Compliance Report Form 31

Syndicate Sales, Inc.
Kokomo, Indiana
Permit Reviewer: TE/EVP

Page 4 of 31
OP No. F067-7699-00026

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastic container/pot and metal floral stem manufacturing operation.

Responsible Official: Paul E. Manning
Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
SIC Code: 3089, 3469
County Location: Howard
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules.

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

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

- (1) one (1) flow coating line consisting of:
 - (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
 - (b) one (1) UV exposure room;
 - (c) two (2) vacuum metallizers;
 - (d) one (1) aqueous dye dip tank;
 - (e) two (2) rinse tanks; and
 - (f) one (1) electric drying oven.
- (2) one (1) metal stamping press line consisting of:
 - (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
 - (b) one (1) packaging operation.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (1) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour;
- (2) propane or liquefied petroleum gas, or butane-fired combustion sources with heat input less than six million (6,000,000) Btu per hour;
- (3) combustion source flame safety purging on startup;
- (4) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (5) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (6) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (7) machining where an aqueous cutting coolant continuously floods the machining interface;
- (8) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (9) cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or

- 0.3 psi measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (10) exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge;
 - (11) any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
 - (12) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;
 - (13) forced and induced draft cooling tower system not regulated under a NESHAP;
 - (14) paved and unpaved roads and parking lots with public access;
 - (15) enclosed systems for conveying plastic raw materials and plastic finished goods;
 - (16) purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source;
 - (17) equipment used to collect released material;
 - (18) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
 - (19) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
 - (20) a laboratory as defined in 326 IAC 2-7-1(20)(C);
 - (21) a plastic molding operation, including five (5) plastic pellet storage silos and eighteen (18) plastic molding machines;
 - (22) a hot stamping operation, including five (5) hot stamp machines;
 - (23) a floral paper operation, including a waxer and a sheeter; and
 - (24) a stemming machine production line, including machining operations and a paint spray booth.

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

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

SECTION B GENERAL CONDITIONS

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

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 FESOP under 326 IAC 2-8.

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

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

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

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

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

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

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

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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 2-8-4(5)(D)]

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, 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.

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

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

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

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(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.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that the source has complied 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 continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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).

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an

action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(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 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any 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) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) 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 until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

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

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

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

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

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

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative

amendments.

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

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

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

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

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

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

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) For each such 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 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) **Alternative Operating Scenarios** [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

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

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

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

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

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

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (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 shall 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.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) Emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) will not apply.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20).
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. 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 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.

**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 must be accredited is not federally enforceable.

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (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 the intended 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.

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

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

Compliance with applicable requirements shall be documented 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 shall notify:

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

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

C.10 Monitoring Methods [326 IAC 3]

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

C.11 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
 - (3) 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

- (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.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

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

If a regulated substance, subject to 40 CFR 68, is present 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 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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

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

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, 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.

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

C.15 Monitoring Data Availability [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (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 2-8-4(3)(B)]

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

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of 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 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance 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 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.

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

- (1) one (1) flow coating line consisting of:
 - (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
 - (b) one (1) UV exposure room;
 - (c) two (2) vacuum metallizers;
 - (d) one (1) aqueous dye dip tank;
 - (e) two (2) rinse tanks; and
 - (f) one (1) electric drying oven.

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4] [326 IAC 8-1-6] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8 and 326 IAC 8-1-6, the total volatile organic compound (VOC) usage in the flow coater shall not exceed 65.8 tons per twelve (12) consecutive months.
- (b) The total for each month shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous eleven (11) months.
- (c) During the first twelve months of operation under this permit, the usage of VOC in the flow coater shall be limited such that the total tons divided by the accumulated months of operation shall not exceed 5.5 tons per month.
- (d) Therefore, the requirements of 326 IAC 2-7 do not apply. This limitation will also render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-3(c)(6)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 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 2-1-4(f), 326 IAC 2-8-4, and 326 IAC 2-8-5.

D.1.4 Work Practices [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the following work practices shall be implemented for the flow coater:

- (1) the cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures;
- (2) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
- (3) any solvent that may be sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) 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.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) 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;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

- (2) one (1) metal stamping press line consisting of:
- (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
 - (b) one (1) packaging operation.

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

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8] [326 IAC 2-2]

Potential VOC emissions from the metal stamping press line are less than 25 tons per year, therefore, this facility is not subject to any of the VOC rules under 326 IAC Article 8 and the requirements of 326 IAC 2-2 (PSD) do not apply. Any change or modification which may increase potential emissions to 25 tons per year from the metal stamping press line shall subject the equipment to the requirements of 326 IAC 8-2-4.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC 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 2-1-4(f), 326 IAC 2-8-4, and 326 IAC 2-8-5.

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

D.2.3 Record Keeping Requirements

- (a) Pursuant to 326 IAC 2-1-3(i)(8), records of surface coating quantities and organic solvent contents shall be maintained for a minimum period of 36 months and made available upon request of the Office of Air Management (OAM).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

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

Source Name: Syndicate Sales, Inc.
Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
FESOP No.: F067-7699-00026

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 Emergency/Deviation Occurrence Reporting Form
- 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: 317-233-6865**

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

Source Name: Syndicate Sales, Inc.
Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
FESOP No.: F067-7699-00026

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) CThe 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 CThe 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) CThe 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: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Syndicate Sales, Inc.
 Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
 Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
 FESOP No.: F067-7699-00026
 Facility: Flow Coater (ID No. 1)
 Parameter: Volatile Organic Compound (VOC) usage
 Limit: The total volatile organic compound (VOC) usage in the flow coater shall not exceed 65.8 tons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous eleven (11) months. During the first twelve months of operation under this permit, the usage of VOC in the flow coater shall be limited such that the total tons divided by the accumulated months of operation shall not exceed 5.5 tons per month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

- 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY COMPLIANCE REPORT**

Source Name: Syndicate Sales, Inc.
 Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
 Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
 FESOP No.: F067-7699-00026

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the 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 zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

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
Federally Enforceable State Operating Permit (FESOP) and Enhanced
New Source Review (ENSR)

Source Background And Description

Source Name:	Syndicate Sales, Inc.
Source Location:	2025 North Wabash Street Kokomo, Indiana 46901-2063
County:	Howard
SIC Code:	3089, 3469
Operation Permit No.:	F067-7699-00026
Permit Reviewer:	Trish Earls/EVP

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Syndicate Sales, Inc. relating to the operation of a stationary plastic container/pot and metal floral stem manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

The source also consists of the following unpermitted facilities/units:

- (1) one (1) flow coating line consisting of:
 - (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
 - (b) one (1) UV exposure room;
 - (c) two (2) vacuum metallizers;
 - (d) one (1) aqueous dye dip tank;
 - (e) two (2) rinse tanks; and
 - (f) one (1) electric drying oven.

- (2) one (1) metal stamping press line consisting of:
 - (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
 - (b) one (1) packaging operation.

Insignificant Activities

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

- (1) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour;
- (2) propane or liquefied petroleum gas, or butane-fired combustion sources with heat input less than six million (6,000,000) Btu per hour;
- (3) combustion source flame safety purging on startup;
- (4) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (5) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (6) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (7) machining where an aqueous cutting coolant continuously floods the machining interface;
- (8) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (9) cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (10) exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge;
- (11) any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- (12) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;
- (13) forced and induced draft cooling tower system not regulated under a NESHAP;
- (14) paved and unpaved roads and parking lots with public access;
- (15) enclosed systems for conveying plastic raw materials and plastic finished goods;
- (16) purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source;
- (17) equipment used to collect released material;
- (18) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (19) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
- (20) a laboratory as defined in 326 IAC 2-7-1(20)(C);
- (21) a plastic molding operation, including five (5) plastic pellet storage silos and eighteen (18) plastic molding machines;
- (22) a hot stamping operation, including five (5) hot stamp machines;
- (23) a floral paper operation, including a waxer and a sheeter; and
- (24) a stemming machine production line, including machining operations and a paint spray booth.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to

receipt of the proper permit:

- (1) one (1) flow coating line consisting of:
 - (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
 - (b) one (1) UV exposure room;
 - (c) two (2) vacuum metallizers;
 - (d) one (1) aqueous dye dip tank;
 - (e) two (2) rinse tanks; and
 - (f) one (1) electric drying oven.
 - (2) one (1) metal stamping press line consisting of:
 - (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
 - (b) one (1) packaging operation.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on December 13, 1996. Additional information was received on September 26, 1997.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (2 pages).

Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	225.7
CO	0.0

NO _x	0.0
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Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential Emissions (tons/year)
TOTAL	0.0

See attached spreadsheets for detailed calculations (2 pages).

- (a) The potential emissions (as defined in the Indiana Rule) of 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) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the 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 emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited Potential To Emit

- (a) To simplify recordkeeping and to accommodate unpredictable variations in production, the source has accepted federally enforceable production limitations that limit potential to emit VOC to 91 tons per 12 consecutive month period. This limit was established at 11/12ths of 99 tons per year to eliminate the effect that daily variations would have on any 365 day period. This limit consists of:
 - (i) 90.56 tons per year for the significant activities; and
 - (ii) 0.44 tons per year for the insignificant activities.
- (b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Flow Coater	0.0	0.0	0.0	65.76	0.0	0.0	0.0
Metal Stamping Presses	0.0	0.0	0.0	24.80	0.0	0.0	0.0
Insignificant Activities	0.0	0.0	0.0	0.44	0.0	0.0	0.0

Total Emissions	0.0	0.0	0.0	91.00	0.0	0.0	0.0
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Attached Table A summarizes the permit conditions and requirements.

County Attainment Status

The source is located in Howard 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 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. Howard County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The metal stamping press line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460, Subpart TT), "Standards of Performance for Metal Coil Surface Coating". This rule applies to each prime coat operation, each finish coat operation, and each prime and finish coat operation combined, when the finish coat is applied wet over the prime coat, and both coatings are cured simultaneously. Where only a single coating is applied to the metal coil, that coating is considered a finish coat. The definition of a finish coat operation is the coating application station, curing oven, and quench station used to apply and dry or cure the final coating on the surface of the metal coil. The metal stamping press line only involves coating the metal coil with a petroleum lubricating oil to facilitate the shaping and cutting of the coil into floral stems in the stamping presses. There are no curing ovens or quench stations associated with this process. The metal stamping press line does not fall under the definition of a finish coat operation, therefore, the requirements of 40 CFR 60.460, Subpart TT do not apply.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or

processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source has accepted federally enforceable operation conditions which limit emissions of volatile organic compounds (VOC) to below 100 tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, source wide VOC emissions must be limited to no more than 99 tons per year. The source has accepted a VOC usage limitation for the Flow Coater (ID No. 1) of 65.76 tons per 12 consecutive month period. By accepting this VOC usage limitation for the Flow Coater (ID No. 1), source wide VOC emissions are limited to 91.0 tons per 12 consecutive month period, thus the source satisfies the requirements of 326 IAC 2-8-4 and the requirements of 326 IAC 2-7 do not apply. These limitations will also render 326 IAC 2-2 not applicable.

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 8-1-6 (New Facilities, General Reduction Requirements)

The flow coater is subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). Potential VOC emissions from the flow coater are 200.44 tons per year. Since the potential VOC emissions are greater than 25 tons per year, the requirements of 326 IAC 8-1-6 apply to the flow coater.

Syndicate Sales, Inc. has submitted a BACT analysis, dated February 19, 1996, as part of this FESOP application.

The options considered in the BACT analysis for the flow coater are:

- (1) Recuperative Thermal Incineration
- (2) Regenerative Thermal Incineration
- (3) Recuperative Catalytic Incineration
- (4) Regenerative Catalytic Incineration
- (5) Flare
- (6) Other Innovative Destruction Technologies

- (7) Carbon Adsorption
- (8) Absorption
- (9) Condensation
- (10) Carbon Adsorption with Recuperative Thermal Incineration
- (11) Absorption and Incineration

It was determined that options 6, 10 and 11 are technically infeasible due to the following reasons:

- (6) None of the innovative destruction technologies such as biofilters or systems applying ultraviolet radiation seem well documented, in particular, process cost information is lacking. These options were not considered to be commercially available.
- (10) The combination of carbon adsorption with thermal oxidation is not a suitable VOC control technology for the flow coater because the inlet VOC concentration is too high. The VOC concentration in the desorb stream would exceed 25% of the LEL, making the concentrated stream unsuitable for thermal oxidation.
- (11) Absorption concentrators are typically suited for batch processes or to equalize pollutant concentrations in a variable stream. The physical characteristics that drive the absorption of pollutants into a liquid also limit the opportunity to remove these pollutants from the liquid stream. Because the combination of absorption with incineration has only limited application, it was not considered feasible.

The technically feasible options are recuperative thermal incineration, regenerative thermal incineration, recuperative catalytic incineration, regenerative catalytic incineration, a flare, carbon adsorption, absorption, and condensation. A cost analysis was performed to determine the economic feasibility of these control options for the flow coater VOC emissions. The cost analysis is based on a federally enforceable limited VOC throughput of 65.76 tons per year for the flow coater.

The tables below show the results of the cost analysis.

(A)

Capital Cost				
Option	Base Price	Direct Cost	Indirect Cost	Total
Recuperative Thermal Incineration	(1)	(1)	(1)	296,596
Regenerative Thermal Incineration	(1)	(1)	(1)	509,598
Recuperative Catalytic Incineration	(1)	(1)	(1)	218,923
Regenerative Catalytic Incineration	(1)	(1)	(1)	171,417
Absorption	(1)	(1)	(1)	2,592,442
Carbon Adsorption	(1)	(1)	(1)	124,275
Condensation	(1)	(1)	(1)	281,923

Flare	(1)	(1)	(1)	167,082
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(1) Total Capital Cost includes Base Price, Direct Cost and Indirect Cost.

(B) Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative Thermal Incineration	12,814	16,033	48,270	77,117
Regenerative Thermal Incineration	9,180	24,553	82,935	116,668
Recuperative Catalytic Incineration	15,097	12,926	33,994	62,017
Regenerative Catalytic Incineration	15,404	11,026	26,263	52,693
Absorption	13,255	107,867	421,908	543,030
Carbon Adsorption	198,222	9,140	19,270	226,632
Condensation	136,899	15,446	45,882	198,227
Flare	427,617	10,853	21,967	460,436

(C) Evaluation

Option	Limited Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton Removed
Recuperative Thermal Incineration	65.76	62.47	95	1,234
Regenerative Thermal Incineration	65.76	62.47	95	1,868

Recuperative Catalytic Incineration	65.76	62.47	95	993
Regenerative Catalytic Incineration	65.76	62.47	95	843
Absorption	65.76	64.44	98	8,427
Carbon Adsorption	65.76	62.47	95	3,628
Condensation	65.76	46.03	70	4,306
Flare	65.76	64.44	98	7,145

Methodology:

Emissions removed = (limited potential emissions from warehouse) * (control efficiency)

\$/ton removed = total annual cost / emissions removed

The cost breakdown is as follows:

1. Capital Cost
 - a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.
 - b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
 - c) Indirect installation cost: engineering, supervision, construction/field expenses, construction fee, start up, performance test, model study and contingencies.
2. Annual Cost
 - a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
 - b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 years life of the system at 10% interest rate).

From the cost analysis, six technology options appear to offer cost effectiveness less than \$5,000 per ton. Absorption and flare options are not cost effective. Carbon adsorption and condensation have marginal cost effectiveness, however, thermal destruction methods offer such greater cost effectiveness than the reclamation options that only the destruction methods were considered further. The annual cost of the destruction methods were compared to Syndicate Sales, Inc.'s average net profit before taxes for 1992 through 1995. The results expressed the total annual cost of the control options as a percentage of the average net profits before taxes for 1992 through 1995. The table below summarizes these results.

Control Option	Capital Cost	% of Net Profit	Annual Cost	% of Net Profit
Recuperative Thermal Incineration	296,596	514	77,117	133
Regenerative Thermal Incineration	509,598	882	116,668	202

Recuperative Catalytic Incineration	218,923	379	62,017	107
Regenerative Catalytic Incineration	171,417	297	52,693	91

Based on this information, none of these control options are economically feasible. Because all options are either technically infeasible or economically infeasible, no VOC emission control has been determined to be BACT. Also, because the BACT analysis was based on an enforceable limited VOC throughput of 65.76 tons per year for the flow coater, this throughput limitation is part of the BACT determination. Thus, in summary, BACT for the flow coater has been determined to be a limited VOC throughput of 65.76 tons per year, no add-on controls, and the following work practices:

- (1) the cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures;
- (2) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
- (3) any solvent that may be sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete.

The metal stamping press line is not subject to the requirements of 326 IAC 8-1-6 since potential VOC emissions from the three (3) stamping presses (ID Nos. 2, 3, and 4), constructed in 1982, are less than 25 tons per year.

326 IAC 8-2-4 (Coil Coating Operations)

The three (3) metal stamping presses (ID Nos. 2, 3, and 4) are not subject to the provisions of 326 IAC 8-2-4 since the presses were constructed in 1982, are located in Howard County, and potential VOC emissions are less than 25 tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The three (3) metal stamping presses (ID Nos. 2, 3, and 4) are not subject to the provisions of 326 IAC 8-2-9 since the presses were constructed in 1982, are located in Howard County, and potential VOC emissions are less than 25 tons per year.

There are no other 326 IAC 8 rules that apply.

Compliance Requirements

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

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds

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

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

The flow coater (ID No. 1) has applicable compliance monitoring conditions as specified below:

- (a) Total VOC usage in the flow coater shall be limited to 65.8 tons per twelve (12) consecutive month period, rolled on a monthly basis.
- (b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include annual VOC usage, rolled on a monthly basis.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

Air Toxic Emissions

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

None of these listed air toxics will be emitted from this source.

Conclusion

The operation of this plastic container and metal floral stem manufacturing operation will be subject to the conditions of the attached proposed **FESOP No. F067-7699-00026**.

Table A

Stack/Vent ID: Vent 1				
Stack/Vent Dimensions: Ht: 35' Dia: 16" Temp: 77°F Flow: 1,980 acfm				
Emission Unit: Flow Coater				
Date of Construction: 7/83				
Alternative Scenario: N/A				
Pollution Control Equipment: N/A				
General Description of Requirement:	VOC usage limitation			
Numerical Emission Limit:	65.8 tons/yr			
Regulation/Citation:	326 IAC 2-8 and 326 IAC 8-1-6			
Compliance Demonstration:	Record keeping and Reporting			
PERFORMANCE TESTING N/A				
Parameter/Pollutant to be Tested:				
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	record keeping and reporting			
Monitoring Method:				
Monitoring Regulation/Citation:				
Monitoring Frequency:	monthly			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	VOC usage per month			
Recording Frequency:	monthly			
Submittal Schedule of Reports:	quarterly			
REPORTING REQUIREMENTS				
Information in Report:	VOC usage per month			
Reporting Frequency/Submittal:	quarterly			
Additional Comments:				

**Appendix A: Emission Calculations
VOC and Particulate
Surface Coating Operations**

Company Name: Syndicate Sales, Inc.
Address, City, IN Zip: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
FESOP: F067-7699
Plt ID: 067-00026
Reviewer: Trish Earls
Date: September 26, 1997

Potential Uncontrolled Emissions:																	
Material (as applied)	Process	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 tons/yr	lb VOC per gal solids	Transfer Efficiency
Valspar UV Cure Lacquer	FC-1	6.85	95.30%	0.00%	95.30%	0.00%	5.51%	85.7	0.0818	6.53	6.53	45.76	1098.32	200.44	0.00	118.48	100.00%
Stamping Oil No. 7	Press 1	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1033	5.82	5.82	1.59	38.11	6.96	0.00	64.70	100.00%
Stamping Oil No. 7	Press 2	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1168	5.82	5.82	1.80	43.09	7.86	0.00	64.70	100.00%
Stamping Oil No. 7	Press 3	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1482	5.82	5.82	2.28	54.68	9.98	0.00	64.70	100.00%
Total State Potential Emissions:												51.43	1234.20	225.24	0.00		
Potential Controlled Emissions:																	
Total Federal Potential Emissions:										FC-1 Material Usage Limitation	Controlled VOC pounds per hour	Controlled VOC pounds per day	Controlled VOC tons per year	Controlled PM tons/yr			
										32.81%	20.68	496.24	90.56	0.00			

Note:
At a 32.81% material usage limitation, VOC emissions from the Flow Coater are limited to 65.76 tons/yr for a source wide VOC limit of 91 tons per year (99 x 11/12), therefore, the requirements of 326 IAC 2-7 do not apply.
Potential emissions from the three stamping presses are less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply.

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 hrs/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = Maximum (units/hr) * Gal of Material (gal/unit) * Density (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer Eff.) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Limited VOC Tons per Year = Potential VOC Tons per Year * Material Usage Limitation (%)

Appendix A: Emission Calculations

Company Name: Syndicate Sales, Inc.
Address City IN Zip: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
FESOP: F067-7699
Pit ID: 067-00026
Reviewer: Trish Earls
Date: September 26, 1997

Total Potential To Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Flow Coater	Metal Stamping Presses	Insignificant Activities*	TOTAL
PM **	0.00	0.00	0.00	0.00
PM10	0.00	0.00	0.00	0.00
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	200.44	24.80	0.44	225.68
CO	0.00	0.00	0.00	0.00
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacities at 8,760 hours/year.

*Insignificant Activity Emissions represent emissions from paint spray booth in stemming machine production line.

**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

Limited Potential To Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Flow Coater	Metal Stamping Presses	Insignificant Activities*	TOTAL
PM **	0.00	0.00	0.00	0.00
PM10	0.00	0.00	0.00	0.00
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC***	65.76	24.80	0.44	91.00
CO	0.00	0.00	0.00	0.00
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacities at 8,760 hours/year.

*Insignificant Activity Emissions represent emissions from paint spray booth in stemming machine production line.

**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

***By accepting a 32.81% usage limitation for the Flow Coater, source wide VOC emissions are limited to 91 tons/yr, therefore, 326 IAC 2-7 does not apply.

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

Addendum to the
Technical Support Document for Federally Enforceable State Operating
Permit (FESOP)

Source Name:	Syndicate Sales, Inc.
Source Location:	2025 North Wabash Street Kokomo, Indiana 46901-2063
SIC Code:	3089, 3469
County:	Howard
Operation Permit No.:	F067-7699-00026
Permit Reviewer:	Trish Earls/EVP

On November 21, 1997, the Office of Air Management (OAM) had a notice published in The Kokomo Tribune, Kokomo, Indiana, stating that Syndicate Sales, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a plastic container/pot and metal floral stem manufacturing operation. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the FESOP:

- Condition B.1 of the FESOP has been changed from:

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

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

and replaced with a new condition which reads as follows (changes in bold for emphasis):

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

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 FESOP under 326 IAC 2-8.

- Condition B.6 of the FESOP has been revised from:

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

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

- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

to read as follows (changes in bold for emphasis):

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

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.**

3. Subsection (c) of Condition B.8 of the FESOP has been revised from:

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

to read as follows (changes in bold):

- (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, 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.**

4. Condition B.11 of the FESOP was revised from:

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

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

such that an additional rule cite was added to the title, subsection (b) was revised, and the rule cite in subsection (c) was changed. The Condition now reads as follows (changes in bold):

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(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)**.

5. Subsections (a) and (b) of Condition B.12 of the FESOP have been revised and subsection (d) has been deleted. Condition B.12 now reads as follows (changes in bold and deletions in strike out):

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

- (a) The Permittee shall annually certify that the source has complied 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 continuous or intermittent;

- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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).

~~(d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.~~

6. Condition B.13 has been revised to read as follows (changes in bold and deletions in strikeout):

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

- (a) **If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:**
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing **emission units and associated** emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - ~~(3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;~~
 - ~~(4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and~~
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**
- (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.

7. Subsection (b)(4) of Condition B.14 of the FESOP has been revised as follows (strike out indicates portion that has been deleted):

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM,

OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

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

8. Condition B.15 has been revised to read as follows (changes in bold):

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

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any **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) Written notification shall be submitted on the attached **Emergency/Deviation Occurrence Reporting Form** or its substantial equivalent.
- (c) **Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.**

9. Subsection (a) and subsection (b)(1) of Condition B.17 of the FESOP have been revised as follows (changes in bold or strikethrough):

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(**21**).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) ~~The Permittee has a duty to submit a timely and complete permit renewal application.~~ A timely renewal application is one that is:

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

(B) **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]**

10. Subsections (b) and (d) of Condition B.19 of the FESOP have been revised as follows (changes in bold):

(b) Minor modification of this permit shall follow the procedures specified under **326 IAC 2-7-12(b), except as provided by 326 IAC 2-8-11(c).**

(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application **provided that the change has received any approval required by 326 IAC 2-1.** After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

11. Subsection (d) of Condition B.20 of the FESOP has been revised as follows (changes in bold):

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, **review by affected states**, and review by U.S. EPA, as they apply to permit issuance and renewal.

12. Condition B.22 of the FESOP has been revised as follows (changes in bold):

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

The Permittee may make Section 502(b)(10) of the Clean Air Act changes **(this term is defined at 326 IAC 2-7-1(36))** without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

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

13. Subsection (b) of Condition B.23 of the FESOP has been revised as follows (changes in bold):

(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).

14. Condition B.24 of the FESOP has been revised as follows (changes in bold):

B.24 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.

15. Subsection (b) of Condition B.26 of the FESOP has been revised as follows (changes in bold):

(b) The written notification shall be sufficient to transfer the permit to the new owner **by an administrative amendment pursuant to 326 IAC 2-8-10**.

16. Condition B.27 of the FESOP has been revised to read as follows (changes in bold or strikeout):

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

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

17. Conditions C.1, C.3, C.5, and C.6 of the FESOP have been revised to read as follows (changes in bold or strikeout):

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) Emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) will not apply.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). ~~The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.~~

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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.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 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.

18. Conditions C.8 through C.17 of the FESOP have been revised to read as follows (changes in bold or strikeout):

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (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 the intended test date. ~~[326 IAC 3-2.1-2(a)]~~

(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.**

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

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 no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a

denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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

C.10 Monitoring Methods [326 IAC 3]

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

C.11 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
- (3) 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

(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.**

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

If a regulated substance, **subject to 40 CFR 68**, is present 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 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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

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

- (5) **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** ~~as described in the Preventive Maintenance Plan~~ shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the **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.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, **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.

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

C.15 Monitoring Data Availability [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (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 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) **Records of 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 2-8-4(3)(C)]

- (a) **To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance 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 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.**

19. Upon further review, Condition D.2.2, Preventive Maintenance Plan, of the FESOP has been deleted since the metal stamping press line does not meet the criteria necessary to require a Preventive Maintenance Plan. All subsequent conditions in Section D.2 have been re-numbered. The rule cite for Preventive Maintenance Plan in Condition D.1.2 of the FESOP has been changed from 326 IAC 2-8-4(9) to 326 IAC 2-8-3(c)(6). The condition now reads as follows (changes in bold):

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-3(c)(6)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

20. Conditions D.1.3 and D.2.3 (now re-numbered as D.2.2) of the FESOP have been revised to read as follows (changes in bold):

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 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 2-1-4(f), 326 IAC 2-8-4, and 326 IAC 2-8-5.

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC 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 2-1-4(f), 326 IAC 2-8-4, and 326 IAC 2-8-5.

21. Condition D.1.4 of the FESOP has been revised for clarification (changes in bold or strikeout):

D.1.4 Work Practices [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, ~~the flow coater shall have no add-on controls, and~~ the following work practices shall be implemented **for the flow coater**:

- (1) the cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures;

- (2) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
 - (3) any solvent that may be sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete.
22. An additional condition, Condition D.1.5, has been added to the FESOP regarding the VOC usage limits in Condition D.1.1. Conditions D.1.5 and D.1.6 have now been re-numbered as Conditions D.1.6 and D.1.7, respectively. Condition D.1.5 now reads as follows:
D.1.5 Volatile Organic Compounds (VOC)
Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) 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.
23. The Certification Form and the Deviation Occurrence Report Form (now the Emergency/Deviation Occurrence Report Form) included with the FESOP have been modified. An additional report form, the Quarterly Compliance Report Form, has also been added and is standard to all FESOPs.