

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW**

OFFICE OF AIR MANAGEMENT

**Rexam Metallising, Division of Rexam, Inc.
2162 Hastings Boulevard
Greenfield, Indiana 46140**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T059-7996-00023	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates stationary paper coating and metallising plant.

Responsible Official: James P. VanWinkle, Plant Manager
Source Address: 2162 Hastings Blvd., Greenfield, Indiana 46140
Mailing Address: 2162 Hastings Blvd., Greenfield, Indiana 46140
SIC Code: 2672
County Location: Hancock
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (a) one (1) polytype paper coater with a maximum processing rate of 394 units of metallized paper per hour;
- (b) one (1) natural gas fired regenerative thermal oxidizer equipped with two (2) burners each rated at 18.8 million (MM) Btu per hour, exhausting through one (1) stack, for controlling the paper coater volatile organic compounds (VOC) emissions;
- (c) two (2) natural gas fired drying ovens rated at 7.9 and 12.9 MMBtu per hour, respectively, both exhausting through the regenerative thermal oxidizer.

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

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

- (a) Metallizer equipped with in-line filters for emissions control;
- (b) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:
 - 1) one (1) 18,000 gallon storage tank with six compartments for storing the three "as applied" coatings; and
 - 2) two (2) 18,000 gallon storage tanks each with three (3) partitions for storing methyl ethyl ketone, isopropyl alcohol and the "as supplied" coating.

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

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

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

SECTION B GENERAL CONDITIONS

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

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

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

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

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

B.4 Enforceability [326 IAC 2-7-7(a)]

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

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

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

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

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

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

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

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

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

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

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

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

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the

information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

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

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 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 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

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9, or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor), in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

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

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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

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

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

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

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

The Permittee:

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

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

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the

parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

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

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

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

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

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

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

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following paper coating line facilities:

- (a) one (1) polytype paper coater with a maximum processing rate of 394 units of metallized paper per hour;
- (b) one (1) natural gas fired regenerative thermal oxidizer equipped with two (2) burners each rated at 18.8 million (MM) Btu per hour, exhausting through one (1) stack, for controlling the paper coater volatile organic compounds (VOC) emissions;
- (c) two (2) natural gas fired drying ovens rated at 7.9 and 12.9 MMBtu per hour, respectively, both exhausting through the regenerative thermal oxidizer;

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

D.1.1 Paper Coating Operations [326 IAC 8-2-5] [326 IAC 8-1-2]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels regardless of substrate may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator.

- (a) To achieve compliance, a regenerative thermal oxidizer shall be in operation at all times when the applied coating, excluding cleaning solvents, has a VOC content in excess of 2.9 pounds VOC per gallon of coating less water.
- (b) When operating the regenerative thermal oxidizer to achieve the limit for rule 326 IAC 8-2-5 (Paper Coating Operations), 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum capture and destruction efficiency necessary to achieve an overall VOC control efficiency of 90.13%. These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90.13%, the VOC content of the coating shall not exceed 48.49 pounds per gallon of coating solids delivered to the applicator.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The input of VOC to the polytype paper coater and the usage of cleanup solvent for the paper coating process [the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent] shall be limited to 247.55 tons used per 12 consecutive month period, calculated after the use of control for those coatings applied during operation of the regenerative thermal oxidizer and no control while the thermal oxidizer is not operating. This VOC usage limitation is required to prevent the VOC emissions from the source being greater than 250 tons per year to avoid the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

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

During the period between 12 and 24 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Method 25, Method 25A (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. The tests shall be performed to verify that the capture system air flow rate and the regenerative thermal oxidizer are operating at parameters (temperature, fan amperage, and duct velocity) necessary to maintain compliance with Conditions D.1.1 and D.1.7. The Permittee shall conduct the following tests:

- (a) The Permittee shall test the destruction efficiency of the regenerative thermal oxidizer while operating at the maximum operating air flow rate of the variable fan speed drive during two (2) of the three (3) one-hour tests.
- (b) During one (1) of the three (3) one-hour tests, the Permittee shall test the capture efficiency of the regenerative thermal oxidizer when operating at the minimum operating air flow rate of the variable fan speed drive to verify that the facility qualifies as a permanent total enclosure.

This test shall be repeated at least once every thirty (30) months from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.5 Volatile Organic Compounds (VOC)

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

D.1.6 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.7 Monitoring

- (a) The regenerative thermal oxidizer for VOC control shall be in operation at all times when necessary to comply with the emission limitation specified in Condition D.1.1.
- (b) When operating, the regenerative thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a temperature determined in the most recent compliance tests to maintain a minimum overall VOC control efficiency of 90.13%.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with 0.35 kilograms per liter of coating excluding water (2.9 pounds per gallon).
 - (1) This device shall have an accuracy of $\pm 2.5\text{EC}$ or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, which is greater.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (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 and D.1.2.
- (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 day that the regenerative thermal oxidizer is not operating;
 - (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) To document compliance with Conditions D.1.1 and D.1.7(a) The Permittee shall record the dates and times, on an hourly basis, of all periods of startup and shutdown of the regenerative thermal oxidizer
- (c) To document compliance with Conditions D.1.1 and D.1.7(a) The Permittee shall record the dates and times, on an hourly basis, of all periods of changeout of coatings when the regenerative thermal oxidizer is not being used.
- (d) To document compliance with Conditions D.1.1 and D.1.7(b)(c) The Permittee shall also record all periods (during actual coating operations) in excess of three (3) hours during which the average temperature remains more than 28EC (50EF) below 1400° F, or the temperature at which compliance with 0.35 kilograms per liter of coating excluding water (2.9 pounds per gallon) was demonstrated during the most recent measurement of thermal oxidizer efficiency. The records shall identify each such occurrence and its duration.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following specifically regulated insignificant activities:

- (a) Metallizer equipped with in-line filters for emissions control;
- (b) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:
 - 1) one (1) 18,000 gallon storage tank with six compartments for storing the three "as applied" coatings; and
 - 2) two (2) 18,000 gallon storage tanks each with three (3) partitions for storing methyl ethyl ketone, isopropyl alcohol and the "as supplied" coating.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the metallizer facility shall not exceed allowable PM emission rate based on the following equation:

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

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

D.2.2 Volatile Organic Compounds [326 IAC 12] [40 CFR 60.110b, Subpart Kb]

Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the three (3) 18,000 gallon VOL storage tank, each with a vapor pressure of less than 15.0 kPa, are subject to 40 CFR Part 60.116b, paragraphs (a) through (c) which requires record keeping.

Compliance Determination Requirement

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1, or the VOC limit in Condition D.2.2, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter

The in-line filters for condensable particulate control shall be in place at all times that the metallizer facility is in operation.

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

D.2.5 Record Keeping Requirement

The Permittee shall maintain permanent records for the three (3) VOL storage tanks at the facility showing:

- (a) the dimension of each storage vessel;

- (b) an analysis showing the capacity of each storage vessel; and
- (c) the true vapor pressure of each VOC stored, indicating that the maximum true vapor pressure of VOC is less than 15.0 kPa for each of the three (3) tanks.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Rexam Metallising, Inc.
Source Address: 2162 Hastings Blvd, Greenfield, Indiana 46140
Mailing Address: 2162 Hastings Blvd, Greenfield, Indiana 46140
Part 70 Permit No.: T059-7996-00023

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Rexam Metallising, Inc.
Source Address: 2162 Hastings Blvd, Greenfield, Indiana 46140
Mailing Address: 2162 Hastings Blvd, Greenfield, Indiana 46140
Part 70 Permit No.: T059-7996-00023

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

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

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

Part 70 Quarterly Report

Source Name: Rexam Metallising, Inc.
Source Address: 2162 Hastings Blvd, Greenfield, Indiana 46140
Mailing Address: 2162 Hastings Blvd, Greenfield, Indiana 46140
Part 70 Permit No.: T059-7996-00023
Facility: Polytype paper coater
Parameter: VOC usage
Limit: 247.55 tons used per 12 consecutive month period, calculated after the use of control for those coatings applied during operation of the regenerative thermal oxidizer, and no control while the thermal oxidizer is not operating

YEAR: _____

Month	VOC usage	VOC usage	VOC usage
	This Month	Previous 11 Months	12 Month Total

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

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

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

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

Source Name: Rexam Metallising, Inc.
Source Address: 2162 Hastings Blvd, Greenfield, Indiana 46140
Mailing Address: 2162 Hastings Blvd, Greenfield, Indiana 46140
Part 70 Permit No.: T059-7996-00023

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Rexam Metallising, Division of Rexam, Inc.
Source Location: 2162 Hastings Blvd., Greenfield, Indiana 46140
County: Hancock
SIC Code: 2672
Operation Permit No.: T059-7996-00023
Permit Reviewer: Jeremy Magliaro/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Rexam Metallising relating to the operation of a paper coating and metallizing facility.

Permitted Emission Units and Pollution Control Equipment

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

- (a) one (1) polytype paper coater with a maximum processing rate of 394 units of metallized paper per hour;
- (b) one (1) natural gas fired regenerative fume incinerator equipped with two (2) burners each rated at 18.8 million (MM) Btu per hour, exhausting through one (1) stack, for controlling the paper coater volatile organic compounds (VOC) emissions;
- (c) two (2) natural gas fired drying ovens rated at 7.9 and 12.9 MMBtu per hour, respectively, both exhausting through the regenerative fume incinerator;

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

New Emission Units and Pollution Control Equipment Requiring ENSR

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

Insignificant Activities

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) one (1) natural gas fired flame treater rated at 1.7 MMBtu per hour;
- (2) Closed loop heating and cooling systems.
- (3) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

- (4) Natural draft noncontact cooling towers not regulated under a NESHAP.
- (5) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Blowdown for any of the following: sight glass; boiler; compressors; pumps;
- (8) Other categories with emissions below insignificant thresholds:
 - (a) Metallizer equipped with in-line filters for emissions control;
 - (b) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:
 - 1) one (1) 18,000 gallon storage tank with six compartments for storing the three "as applied" coatings; and
 - 2) two (2) 18,000 gallon storage tanks each with three (3) partitions for storing methyl ethyl ketone, isopropyl alcohol and the "as supplied" coating.

Existing Approvals

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

- (1) CP-059-5058-00023, issued on June 6, 1996;

All conditions from previous approvals were incorporated into this Part 70 permit. However, the previously issued construction permit mandated that Rexam operate the regenerative fume incinerator at all times that the polytype paper coating system was in operation. This limited their source-wide potential to emit VOC to 100.7 tons per year.

Rexam has requested in this Part 70 permit that they be required to operate the regenerative fume incinerator only when necessary to comply with 326 IAC 8-2-5 (Paper Coating Operations) (see State Rule Applicability - Individual Facilities), while limiting their potential to emit VOC to less than 250 tons per year to avoid 326 IAC 2-2 (Prevention of Significant Deterioration).

This increase in the potential to emit VOC requires Enhanced New Source Review (ENSR) as part of this Part 70 Operating Permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 16, 1996. Additional information was received on September 24, 1998.

A notice of completeness letter was mailed to the source on January 30, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (three (3) 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	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

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

HAP's	Potential Emissions (tons/year)
Methyl ethyl ketone (MEK)	greater than 10
Glycol ethers	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) 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) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Natural gas combustion	--	--	--	1.45	--	--	--
Polytype paper coater	--	--	--	247.55	--	--	--
Total Emissions	--	--	--	249.0	--	--	--

County Attainment Status

The source is located in Hancock County.

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

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

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The New Source Performance Standard (326 IAC 12), 40 CFR Part 60, Subpart QQ (Publication Rotogravure Printing), is not applicable to this source because this source does not perform publication rotogravure printing as defined in the rule.

- (b) The National Emission Standard for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63 Subpart KK (Printing Operations) is not applicable to this source because this source does not perform publication rotogravure, product and packaging rotogravure, or wide web flexographic printing as defined in the rule.
- (c) The three (3) 18,000 gallon volatile organic liquid (VOL) storage tanks (see Insignificant Activities) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" since each of the tanks were installed after July 23, 1984, and each has a storage capacity greater than 40 cubic meters. However, each VOL storage tank has a vapor pressure of less than 15.0 kPa, and has a design capacity less than 75 m³, therefore, the tanks are subject to only 40 CFR Part 60.116b, paragraph (a) through (c) which requires record keeping.

State Rule Applicability - Entire Source

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

The source has submitted a Preventive Maintenance Plan (PMP) on December 16, 1996 with their Title V Permit Application package. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

The input of VOC to the polytype paper coater shall be limited to 247.55 tons used per 12 consecutive month period, calculated after the use of control for those coatings applied during operation of the regenerative fume incinerator and no control while the incinerator is not operating. This VOC usage limitation, when combined with potential VOC emissions from natural gas combustion at the source (see Appendix A, page 3 of 3), will prevent the VOC emissions from the source being greater than 250 tons per year to avoid the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability - Individual Facilities

326 IAC 6-3 (Process Operations)

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the metallizer facility (see insignificant activities) shall not exceed allowable PM emission rate based on the following equation:

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

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

The metallizer facility is equipped with in-line filters to reduce condensible PM emissions. The in-line filters shall be in place at all times that the metallizer facility is in operation in order to comply with this limit.

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

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels regardless of substrate may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator. The polytype paper coater is subject to this rule because it was constructed after 1980 and has the potential to emit greater than 25 tons of VOC per year while coating paper.

- (a) To achieve compliance, a regenerative fume incinerator shall be in operation at all times when the applied coating, excluding cleaning solvents, has a VOC content in excess of 2.9 pounds VOC per gallon of coating less water. These "noncompliant" coatings currently include the coatings identified on page 1 of 3 of Appendix A as C7, C15, C16, C31, and CK3940.
- (b) When operating the regenerative fume incinerator to achieve the limit for rule 326 IAC 8-2-5 (Paper Coating Operations), 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the fume incinerator shall maintain a minimum capture and destruction efficiency necessary to achieve an overall VOC control efficiency of 90.13%. These efficiencies and the use of the fume incinerator are required by rule 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90.13%, the VOC content of the coating shall not exceed 48.49 pounds per gallon of coating solids delivered to the applicator.
- (c) The input of VOC to the polytype paper coater and the usage of cleanup solvent for the paper coating process [the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent] shall be limited to 247.55 tons used per 12 consecutive month period, calculated after the use of control for those coatings applied during operation of the regenerative fume incinerator and no control while the incinerator is not operating. This VOC usage limitation, when combined with potential VOC emissions from natural gas combustion at the source (see Appendix A, page 3 of 3), will prevent the VOC emissions from the source being greater than 250 tons per year to avoid the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21.

Rexam Metallising has indicated in their permit application that the regenerative fume incinerator is currently operating at 100% capture (permanent total enclosure) and a 98% destruction efficiency in compliance with 326 IAC 8-2-5 (Paper Coating Operations).

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

Pursuant to 326 IAC 8-9-2 (Exemptions), the three (3) 18,000 VOL storage vessels are not subject to this rule because they are subject to 40 CFR Part 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The regenerative fume incinerator controlling the polytype paper coater has applicable compliance monitoring conditions as specified below:
 - (a) The regenerative fume incinerator shall be in operation at all times when the applied coating, excluding cleaning solvents, has a VOC content in excess of 2.9 pounds VOC per gallon of coating less water, and shall maintain a minimum capture and destruction efficiency necessary to achieve an overall VOC control efficiency of 90.13%. When operating, the incinerator shall maintain a minimum operating temperature of 1400° F, or a temperature and fan speed determined in the most recent compliance tests to maintain a minimum overall VOC control efficiency of 90.13%.
 - (b) The Permittee shall record the dates and times, on an hourly basis, of all periods of startup and shutdown of the regenerative fume incinerator
 - (c) The Permittee shall record the dates and times, on an hourly basis, of all periods of changeout of coatings when the regenerative fume incinerator is not being used.
 - (d) The Permittee shall also record all periods (during actual coating operations) in excess of three (3) hours during which the average temperature remains more than 28EC (50EF) below the temperature at which compliance with 0.35 kilograms per liter of coating excluding water (2.9 pounds per gallon) was demonstrated during the most recent measurement of oxidizer efficiency. The records shall identify each such occurrence and its duration.

These monitoring conditions are necessary because the regenerative fume incinerator must operate properly when necessary for the source to comply with 326 IAC 8-2-5 (Paper Coating Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this paper coating and metallizing facility shall be subject to the conditions of the attached proposed **Part 70 Permit No. T059-7996-00023**.

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

Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit
and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Rexam Metallising, Division of Rexam, Inc.
Source Location: 2162 Hastings Blvd., Greenfield, Indiana 46140
County: Hancock
SIC Code: 2672
Operation Permit No.: T059-7996-00023
Permit Reviewer: Jeremy Magliaro/EVP

On October 23, 1998, the Office of Air Management (OAM) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that Rexam Metallising had applied for a Part 70 Operating Permit for the operation of their paper coating and metallizing source.. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 9, 1998, Rexam Metallising submitted comments on the proposed Part 70 Permit. The summary of the comments is as follows:

Comment #1

The term used consistently throughout the permit is a “regenerative fume incinerator.” We have used the term “regenerative thermal oxidizer” internally to describe this device and would like to use that terminology in the permit if possible. We also are not generating any “fumes”, a condensation of particulate generated from heating metals, but are controlling “vapors” of solvents being dried off coated webs.

Response #1

The terminology of “regenerative fume incinerator” describing the VOC control device on the polytype paper coater has been changed to read “regenerative thermal oxidizer” throughout the permit.

Comment #2

Regarding Condition A.3 (Insignificant Activities), we noted in the insignificant category located in Section D.2 that our storage tanks are listed but did not find them listed in this section. We would like the permit to be consistent and ask that these storage tanks be listed in both sections of the permit. Additionally, we have a few small space and water heaters that do not show up in the draft permit. We believe them to be truly insignificant but ask whether they should appear directly on this permit to insure completeness. All are natural gas fired devices.

Response #2

Our records indicate that the insignificant storage tanks listed in Section D.2 are also listed in Condition A.3. Upon further discussion with Rexam, it was verified that the small space and water heaters are insignificant activities and are not regulated by the Part 70 Permit. There were no changes to the permit from this comment.

Comment #3

Regarding Condition D.1.7(b), we will be pleased to meet the 1400EF standard for operation of the unit but have a problem with the further statement about "... or temperature and fan speed determined in the most recent compliance test..." The drives on the fans are variable speed drives with speed defined by specific operating conditions seen by the fan controllers. As you can see, the energy and operational efficiencies of the variable speed drives would be negated by this permit requirement. We would recommend simply allowing for the 1400EF or temperature during the most recent compliance test as the criteria for compliance. Otherwise, we are wasting energy to meet a requirement for a system that is intentionally designed to conserve energy.

Response #3

The OAM does not wish to negate the operational efficiency of the fan. However, the OAM also recognizes the importance of air flow in VOC control from this facility. Therefore, the OAM will allow the variable fan speed drive to operate in this manner provided that during the performance test required in Condition D.1.4, the Permittee shall establish a range of fan operating speeds. Upon further discussion, Rexam has agreed to conduct the three (3) one-hour performance tests required under Method 25, Method 25A (40 CFR 60, Appendix A), or methods as approved by the commissioner in the following manner to satisfy Condition D.1.4:

- (a) The Permittee shall test the destruction efficiency of the regenerative thermal oxidizer while operating at maximum operating air flow rate of the variable fan speed drive during two (2) of the three (3) tests.
- (b) During one (1) of the three (3) tests, the Permittee shall test the capture efficiency of the regenerative thermal oxidizer when operating at the lowest operating air flow rate of the variable fan speed drive to verify that the facility qualifies as a permanent total enclosure.

Therefore, Conditions D.1.4 and D.1.7(b) have been changed as follows to incorporate the revised requirements;

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

During the period between 36 and 48 months after issuance of this permit, the Permittee shall perform VOC testing utilizing **Method 25, Method 25A (40 CFR 60, Appendix A), or other** methods as approved by the Commissioner. The tests shall be performed to verify that the capture system air flow rate and the regenerative thermal oxidizer are operating at parameters (temperature, fan amperage, and duct velocity) necessary to maintain compliance with Conditions D.1.1 and D.1.7. The Permittee shall conduct the following tests:

- (a) The Permittee shall test the destruction efficiency of the regenerative thermal oxidizer while operating at the maximum operating air flow rate of the variable fan speed drive during two (2) of the three (3) one-hour tests.**
- (b) During one (1) of the three (3) one-hour tests, the Permittee shall test the capture efficiency of the regenerative thermal oxidizer when operating at the minimum operating air flow rate of the variable fan speed drive to verify that the facility qualifies as a permanent total enclosure.**

This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.7 Monitoring

- (b) When operating, the regenerative thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a temperature ~~and fan speed~~ determined in the most recent compliance tests to maintain a minimum overall VOC control efficiency of 90.13%.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The IDEM now believes that this condition is not necessary and has remove it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of credible evidence and an explicit statement is not required in the permit.

~~B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

2. Condition C.2 (Opacity), has been changed as follows to incorporate changes to the rule:

C.2 Opacity [326 IAC 5-1]

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

- (a) ~~Visible Emissions Opacity~~ shall not exceed an average of forty percent (40%) ~~opacity in any one (1) six (6) minute averaging period in twenty four (24) consecutive readings,~~ as determined in 326 IAC 5-1-4.
 - (b) ~~Visible Emissions Opacity~~ shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9, or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**), in a six (6) hour period.
3. The OAM has determined that, pursuant to current IDEM stack testing guidance, all paper coating and printing facilities in Indiana with potential VOC emissions greater than 100 tons per year, which utilize a control device to reduce VOC emissions are required to conduct a performance test every 2.5 years rather than every 5 years. Therefore, Condition D.1.4 (Testing) has been revised as follows:

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

During the period between ~~36 and 48~~ **12 and 24** months after issuance of this permit, the Permittee shall perform VOC testing utilizing Method 25, Method 25A (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. The tests shall be performed to verify that the capture system air flow rate and the regenerative thermal oxidizer are operating at parameters (temperature, fan amperage, and duct velocity) necessary to maintain compliance with Conditions D.1.1 and D.1.7. The Permittee shall conduct the following tests:

- (a) The Permittee shall test the destruction efficiency of the regenerative thermal oxidizer while operating at the maximum operating air flow rate of the variable fan speed drive during two (2) of the three (3) one-hour tests.
- (b) During one (1) of the three (3) one-hour tests, the Permittee shall test the capture efficiency of the regenerative thermal oxidizer when operating at the minimum operating air flow rate of the variable fan speed drive to verify that the facility qualifies as a permanent total enclosure.

This test shall be repeated at least once every ~~five (5) years~~ **thirty (30) months** from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

Company Name: Rexam Metallising
Address City IN Zip: 2162 Hastings Blvd., Greenfield, Indiana 46140
Title V: T059-7996-00023
Reviewer: JM/EVP
Date: September 29, 1998

Potential Emissions (uncontrolled):																		
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 ton/yr	lb VOC /gal solids	Transfer Efficiency	VOC control required efficiency to comply with 8-2-5
C5												17.11	410.69	74.95	0.00			N/A
C7												160.20	3844.68	701.65	0.00			37.55%
C16												78.77	1890.41	345.00	0.00			90.13%
CK3940												68.68	1648.22	300.80	0.00			67.76%
C31												988.80	23731.11	4330.93	0.00			85.14%
C10												89.06	2137.54	390.10	0.00			N/A
C15												64.24	1541.76	281.37	0.00			87.38%
Total Uncontrolled Potential Emissions:												1466.85	35204.42	6424.81	0.00			

Potential Emissions (controlled):						
Total Controlled Potential Emissions:	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
	90.13%	na	144.78	3474.68	634.13	0.00

That the input of VOC to the polytype paper coater shall be limited to 247.55 tons used per 12 consecutive month period, calculated after the use of control for those coatings applied during operation of the regenerative fume incinerator and no control while the incinerator is not operating. This VOC usage limitation, when combined with potential VOC emissions from natural gas combustion at the source (see Appendix A, page 3 of 3), will prevent the VOC emissions from the source being greater than 250 tons per year to avoid the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21.

Required VOC Control Efficiency = (lb VOC/gal solids -E)/lb VOC/gal solids * 100
E= (2.9 lb VOC/gal of coating/(1-(2.9 lb VOC/gal of coating/7.36 lb VOC/gal coating solids)) = 4.786 lb VOC/gal of solids

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

**** Rexam Metallising submitted information necessary for emission calculations and requested that this information be kept confidential, pursuant to 326 IAC 17-1-6 (Confidential Claims). OAM has conducted the emission calculations based on the submitted confidential information.**

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VOC and Particulate
From Surface Coating Operations**

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Title V: T059-7996-00023
Reviewer: JM/EVP
Date: September 29, 1998

Potential Emissions (uncontrolled):																			
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 ton/yr	lb VOC /gal solids	Transfer Efficiency	VOC control required efficiency to comply with 8-2-5	
C5	varnish precoat	8.50	61.40%	52.70%	8.70%	54.10%	16.40%	0.260	89.00	1.6	0.74	17.11	410.69	74.95	0.00	4.51	1	N/A	
C7	varnish precoat	8.20	73.00%	53.00%	20.00%	51.80%	21.40%	0.330	296.00	3.4	1.64	160.20	3844.68	701.65	0.00	7.66	1	37.55%	
C16	varnish, precoat	7.30	83.00%	0.00%	83.00%	0.00%	12.50%	1.300	10.00	6.1	6.06	78.77	1890.41	345.00	0.00	48.47	1	90.13%	
CK3940	varn., pre, + topcoat	8.00	79.50%	50.00%	29.50%	48.30%	15.90%	0.970	30.00	4.6	2.36	68.68	1648.22	300.80	0.00	14.84	1	67.76%	
C31	varnish, precoat	7.20	76.50%	0.00%	76.50%	0.00%	17.10%	0.480	374.00	5.5	5.51	988.80	23731.11	4330.93	0.00	32.21	1	85.14%	
C10	topcoat	8.40	75.40%	64.90%	10.50%	65.60%	21.80%	0.270	374.00	2.6	0.88	89.06	2137.54	390.10	0.00	4.05	1	N/A	
C15	topcoat	7.30	80.00%	0.00%	80.00%	0.00%	15.40%	1.100	10.00	5.8	5.84	64.24	1541.76	281.37	0.00	37.92	1	87.38%	
Total Uncontrolled Potential Emissions:												1466.85	35204.42	6424.81	0.00				

Potential Emissions (controlled):						
Total Controlled Potential Emissions:	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
	90.13%	na	144.78	3474.68	634.13	0.00

That the input of VOC to the polytype paper coater shall be limited to 247.55 tons used per 12 consecutive month period, calculated after the use of control for those coatings applied during operation of the regenerative fume incinerator and no control while the incinerator is not operating. This VOC usage limitation, when combined with potential VOC emissions from natural gas combustion at the source (see Appendix A, page 3 of 3), will prevent the VOC emissions from the source being greater than 250 tons per year to avoid the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21.

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E= (2.9 lb VOC/gal of coating/(1-(2.9 lb VOC/gal of coating/7.36 lb VOC/gal coating solids)) = 4.786 lb VOC/gal of solids

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

HAP Emission Calculations

Company Name: Rexam Metallising
Plant Location: 2162 N. Hastings Blvd, Greenfield, IN 46140
County: T-059-7996-00023
Permit Reviewer: JM/EVP
Date: September 29, 1998

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Glycol Ethers	MEK (ton/yr)	Glycol Ethers Emissions (ton/yr)
C5	8.50	0.260	89.00	0.00%	4.00%	0.00	34.46
C7	8.20	0.330	296.00	0.00%	4.00%	0.00	140.33
C16	7.30	1.300	10.00	57.45%	0.00%	238.80	0.00
CK3940	8.00	0.970	30.00	0.00%	4.00%	0.00	40.79
C31	7.20	0.480	374.00	30.00%	0.00%	1698.40	0.00
C10	8.40	0.270	374.00	0.00%	4.00%	0.00	148.61
C15	7.30	1.100	10.00	47.40%	0.00%	166.71	0.00

Total State Potential Emissions **2103.91** **364.19**
 After Control: **207.66** **35.95**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

The potential HAP emissions "after control" are based on the minimum 90.13% control efficiency required by 326 IAC 8-2-5 and operation of the incinerator at all times.

HAP Emission Calculations

Company Name: Rexam Metallising
Plant Location: 2162 N. Hastings Blvd, Greenfield, IN 46140
County: T-059-7996-00023
Permit Reviewer: JM/EVP
Date: September 29, 1998

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Glycol Ethers	MEK (ton/yr)	Glycol Ethers Emissions (ton/yr)
C5							
C7							
C16							
CK3940							
C31							
C10							
C15							

Total State Potential Emissions	2103.91	364.19
After Control:	207.66	35.95

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 The potential HAP emissions "after control" are based on the minimum 90.13% control efficiency required by 326 IAC 8-2-5 and operation of the incinerator at all times

**** Rexam Metallising submitted information necessary for emission calculations and requested that this information be kept confidential, pursuant to 326 IAC 17-1-6 (Confidential Claims). OAM has conducted the emission calculations based on the submitted confidential information.**

Natural Gas Combustion

Company Name: Rexam Metallising
 Address City IN Zip: 2162 N. Hastings Blvd, Greenfield, IN 46140
 Title V: T-059-7996-00023
 Reviewer: JM/EVP
 Date: September 29, 1998

NATURAL GAS COMBUSTION EMISSIONS

SOURCE	Number of Furnaces	mmbtu/hr Rating	Annual Hrs Operation	Annual Nat. Gas (mmcf)	POTENTIAL TO EMIT									
					PM/PM10		SO2		NOX		CO		VOC	
					(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)
fume incinerator	2	18.80	8760.0	329.4	0.29	1.25	0.02	0.10	3.76	16.47	3.16	13.83	0.21	0.91
drying oven	1	12.90	8760.0	113.0	0.10	0.43	0.01	0.03	1.29	5.65	1.08	4.75	0.07	0.31
drying oven	1	7.90	8760.0	69.2	0.06	0.26	0.00	0.02	0.79	3.46	0.66	2.91	0.04	0.19
flame treater	1	1.70	8760.0	14.9	0.01	0.06	0.00	0.00	0.16	0.70	0.07	0.30	0.01	0.04
COMBUSTION TOTALS, TONS/YR.						2.00		0.16		26.28		21.78		1.45

NOTE: Assume that the heating value of natural gas is 1000 Btu / Cubic Foot.

SAMPLE CALCULATION	$\frac{\text{MMCF}}{\text{YR}}$	X	$\frac{\text{LB}}{\text{MMCF}}$	X	$\frac{\text{TONS}}{\text{LB}}$	=	$\frac{\text{TONS}}{\text{YR}}$
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UNITS	Natural Gas Emission Factors		
	Rated Capacity, MMBtu/hr		
	0 - 0.3	0.3-100	> 100
PM*	7.6	7.6	7.6
SO2	0.6	0.6	0.6
NOx**	94	100	190
CO	40	84	84
VOC	5.5	5.5	5.5
SOURCE	AP-42, Chapter 1.4		

* All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.