

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**3M
0304S-075E
Hartford City, Indiana 47348**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

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| Construction Permit No.: CP-009-9364-00004 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

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SECTION A SOURCE SUMMARY

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

A.1 General Information

The Permittee owns and operates a paper and other web coating line designated as the BC-2 Coater.

Responsible Official: James B. Welsh

Source Address: 0304S-075E, Hartford City, Indiana 47348

Mailing Address: 3M Center, Bldg 42-2E-27, P.O. Box 33331, St. Paul, MN, 55133-3331

SIC Code: 2600

County Location: Blackford County

County Status: Attainment for all criteria pollutants

Source Status: State Construction and Operation Permit

Major Source, under PSD Rules,

Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary

This modification to the stationary source consists of changes to the BC-2 Coater the details of which 3M considers to be confidential.

A.3 Part 70 Applicability [326 IAC 2-7-2]

This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has submitted to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), a Part 70 (T009-7712-00004) application on December 13, 1996. The equipment changes being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Section B Construction Conditions

General Construction Conditions [326 IAC 2-1-3]

B.1 Allowable Emissions

That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

B.2 General Rule Applicability

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.3 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, Sections C and D.1 of this permit become effective upon its issuance.

- B.4 Revocation of Permits [326 IAC 2-1-9(b)]
Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
- B.5 Modification of Construction Conditions
Notwithstanding Condition B.6, all requirements of these construction conditions shall remain in ~~effect unless modified in a manner consistent with procedures established for modifications of~~ construction permits pursuant to 326 IAC 2 (Permit Review Rules).
- B.6 First Time Operation Permit [326 IAC 2-1-4]
That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or ~~hand delivered to IDEM~~
 - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
 - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

Section C Source Operation Conditions

Entire Source

General Operation Conditions [326 IAC 2-1-4]

- C.1 General Operation Conditions
- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
 - (b) The permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]
Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
- (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

C.3 Transfer of Permit [326 IAC 2-1-6]
Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of the BC-2 Coater line is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

C.4 Permit Revocation [326 IAC 2-1-9(a)]
Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
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- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

C.5 Availability of Permit [326 IAC 2-1-3(l)]
Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

- C.6 Opacity Limitations [326 IAC 5-1-2]
Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:
- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
 - (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.
- C.7 Open Burning [326 IAC 4-1] [IC 13-17-9]
The permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.
- C.8 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

~~The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.~~
- C.9 Emergency Reduction Plans [326 IAC 1-5-2]
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 180 calendar days from the issuance date of this permit.~~
 - (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. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM, shall supply such a plan.
 - (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.
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- (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 level. [326 IAC 1-5-3]

C.10 Malfunction Condition [326 IAC 1-6-2]
Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

Compliance Monitoring Requirements

C.12 Compliance Monitoring

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

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

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

C.13 Monitoring Methods [326 IAC 3]

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

C.14 Compliance Monitoring Plan - Failure to Take Response Steps

- (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.

C.15 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall insure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) asbestos removal or demolition start date;
 - (B) removal or demolition contractor; or
 - (3) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

Record Keeping and Reporting Requirements

C.16 Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) 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.17 General Record Keeping Requirements

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

- (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. 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.18 General Reporting Requirements

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) ~~A malfunction as defined in 326 IAC 1-6-2; or~~
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

BC-2 Coater line

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC)

- (a) The input VOC usage to the BC-2 coater when operating without controls added to the input VOC usage to the BC-2 coater when the capture system and thermal oxidizer are in operation shall be limited such that the potential to emit (PTE) VOCs based on the following equations does not exceed 485 tons per twelve (12) consecutive month period:

$$E_{VOC} = (u_u * w_{u,avg}) + (u_c * w_{c,avg} * (1 - c_{eff})) \quad (i)$$

$$PTE_{VOC} = (E_{VOC, this\ month} + E_{VOC, last\ 11\ months}) \quad (ii)$$

| | | | |
|--------|-------------|---|--|
| where: | E_{VOC} | / | the monthly emissions of VOCs in tons per month |
| | u_u | / | the total amount of uncontrolled coatings used in tons per month (when the capture system or thermal oxidizer is not operating) |
| | $w_{u,avg}$ | / | the monthly usage weighted average weight percent (%) VOC of uncontrolled coatings used |
| | u_c | / | the total amount of controlled coatings used in tons per month (when both the capture system and thermal oxidizer are operating) |
| | $w_{c,avg}$ | / | the monthly usage weighted average weight percent (%) VOC of controlled coatings used |
| | c_{eff} | / | the overall control efficiency of the control system |
| | PTE_{VOC} | / | the potential to emit VOCs in tons per twelve (12) consecutive month period |

- (b) The control system shall be operated at all times that coatings with volatile organic compound contents greater than or equal to 2.9 pounds per gallon are used. For the purpose of determining compliance with the above equation, the overall control efficiency (c_{eff}) of the control system shall be considered to be 78.8 percent (%) provided the capture system and thermal oxidizer which make up the control system are operating in compliance with the monitoring provisions specified in Condition D.1.3. A fifteen (15) minute period per calendar month shall be allowed to exercise the purge stack dampers provided that a monthly summary including the time and date of each exercising period is recorded and submitted to the OAM upon request.
- (c) During the first twelve (12) months of operation, the controlled and uncontrolled input VOC usages shall be limited such that the potential to emit (PTE) VOCs based on equation (ii) shall not exceed one twelfth (1/12) of the limit specified in (a) multiplied by the accumulated months of operation.
- (d) Due to these limitations, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

Compliance Determination Requirements

D.1.2 Testing Requirements

Testing of these facilities are not specifically required by this permit. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.1.3 Thermal Oxidizer

At all times that the control system for the BC-2 Coater line is in operation and being utilized to demonstrate compliance with the limitations set forth in Condition D.1.1, the control system shall be operated such that:

- (a) The static pressure of each capture system fan shall not be less than the static pressure required to achieve the overall control efficiency specified in Condition D.1.1(b), or a more appropriate static pressure as determined by the most recent stack test data.
- (b) The thermal oxidizer shall operate above the minimum operating temperature of 1,416 degrees Fahrenheit (°F), or a more appropriate temperature as determined by the most recent stack test data, which has been demonstrated to achieve the overall control efficiency specified in Condition D.1.1(b).
- (c) The sensors and recording equipment measuring the capture system static pressure and thermal oxidizer temperature are operating.

D.1.4 Monitoring

- (a) The Permittee shall record the capture system static pressures specified in D.1.3(a) and the operating temperature of the thermal oxidizer specified in D.1.3(b), at least once daily when the control system for the BC-2 Coater line is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the control system static pressures and the thermal oxidizer operating temperature shall not fall below the minimum operating levels specified in D.1.3. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when these readings are below the specified levels.
- (b) The Preventive Maintenance Plan for this unit shall contain shutdown procedures for the thermal oxidizer and capture system. The Permittee shall record the date(s) and time(s) when the thermal oxidizer or air recirculating system is started up or shutdown.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirements

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be determined at least monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material used when the control system is not operating, and the amount and VOC content of each coating material used when the control system is operating. 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 usage weighted VOC content of the coatings used for each period that the control system is not in operation, and the usage weighted VOC content of the coatings used for each period that the control system is in operation;

- (4) The total VOC usage for each period that the control system is not in operation, and the total VOC usage for each period that the control system is in operation; and
 - (5) The weight of VOCs emitted each month as calculated according to equation (i) of Condition D.1.1.
 - (6) A log of the dates and times of each purge stack damper exercising period.
- (b) To document compliance with Condition D.1.3 and D.1.4, the Permittee shall maintain a log of daily static pressure and temperature observations, startup and shutdown date(s) and time(s), and those additional inspections prescribed by the Preventive Maintenance Plan for the control system.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

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

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO₂, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management - Office of Air Management - Compliance Data Section
Quarterly Report of Twelve (12) Consecutive Month Total

Company Name: 3M
Location: 0304S-075E, Hartford City, IN
Permit No.: 009-9364-00004
Source/Facility: BC-2 Coater line
Pollutant: volatile organic compounds (VOC)

Year: _____

| Month | uncontrolled coatings usage this month (tons/month) | volume weighted average VOC content of uncontrolled coatings used this month (wt. %) | weight of uncontrolled VOCs emitted this month (tons/month) | controlled coatings usage this month (tons/month) | volume weighted average VOC content of controlled coatings used this month (wt. %) | weight of controlled VOCs emitted this month (tons/month) | total weight of controlled and uncontrolled VOCs emitted this month (ton/month) | total weight of controlled and uncontrolled VOCs emitted last 12 months (tons/12-months) | limit (tons/12-months) |
|-------|---|--|---|---|--|---|---|--|------------------------|
| | | | | | | | | | 485 |
| | | | | | | | | | 485 |
| | | | | | | | | | 485 |

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

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

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

| | |
|--------------------------|---|
| Source Name: | 3M |
| Source Location: | 0304S-075E, Hartford City, Indiana, 47348 |
| County: | Blackford |
| Construction Permit No.: | CP-009-9364-00004 |
| SIC Code: | 2600 |
| Permit Reviewer: | Janusz Johnson |

The Office of Air Management (OAM) has reviewed an application from 3M relating to the modification and operation of the BC-2 Coater line. Because 3M considers certain information relating to the BC-2 Coater line and the changes being made to be confidential, details of the equipment of the BC-2 Coater line will not be included in this document.

Stack Summary

The number of stacks related to the BC-2 Coater is considered confidential by 3M.

Recommendation

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

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

An application for the purposes of this review was received on January 9, 1998, with additional information received on March 12, 1998.

Emissions Calculations

3M considers details about the BC-2 Coater and changes to the oven zone to be confidential. Therefore, no emissions calculations are included as a part of this document. However, the summary of emissions from the calculations shall be included as a basis of the permit determinations made herein.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

| Pollutant | Allowable Emissions (tons/year) | Potential Emissions (tons/year) |
|--------------------------------------|---------------------------------|---------------------------------|
| Particulate Matter (PM) | 0.5 | 0.5 |
| Particulate Matter (PM10) | 0.5 | 0.5 |
| Sulfur Dioxide (SO ₂) | 0.0 | 0.0 |
| Volatile Organic Compounds (VOC) | 232.3 | 232.3 |
| Carbon Monoxide (CO) | 0.9 | 0.9 |
| Nitrogen Oxides (NO _x) | 4.2 | 4.2 |
| Single Hazardous Air Pollutant (HAP) | 83.4 | 83.4 |
| Combination of HAPs | 287.3 | 287.3 |

- (a) The potential emissions before control are the same as the allowable emissions, therefore, the allowable emissions are used for the permitting determination.
- (b) Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.
- (c) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and allowable emissions of combined hazardous air pollutants (HAPs) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Blackford County has been classified as attainment or unclassifiable for all other regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

| Pollutant | Emissions (ton/yr) |
|-----------------|--------------------|
| PM | 148 |
| PM10 | 148 |
| SO ₂ | 1949 |
| VOC | 3303 |
| CO | 0.0 |
| NO _x | 326 |

- (a) This existing source is a major stationary source because attainment regulated pollutants (SO₂, VOC, and NO_x) are emitted at a rate of 250 tons per year or more.
- (b) These emissions were based on AIRS Facility Quick Look Report dated April 1, 1998.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

| Pollutant | PM (ton/yr) | PM10 (ton/yr) | SO ₂ (ton/yr) | VOC (ton/yr) | CO (ton/yr) | NO _x (ton/yr) |
|-----------------------|-------------|---------------|--------------------------|--------------|-------------|--------------------------|
| Proposed Modification | 0.5 | 0.5 | 0.0 | 39.0 | 0.9 | 4.2 |
| PSD Threshold Level | 25 | 15 | 40 | 40 | 100 | 40 |

This modification to an existing major stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T009-7712-00004) application on December 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to these facilities. Specifically, 40 CFR Part 60.440 (Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) does not apply because:
- (1) The BC-2 Coater line was originally constructed in 1963 (prior to the applicability date of December 30, 1980),
 - (2) The proposed changes to the BC-2 Coater do not constitute a reconstruction because the fixed capital cost of the new equipment does not exceed 50% of the fixed capital cost required to construct an entirely new facility, and
 - (3) The NSPS modification provisions require application of the NSPS when a physical or operational change occurs which could result in an increase in the hourly potential emissions, unless such change qualified for one of the exemptions at 40 CFR 60.14 (e). The emission rate before and after a physical or operational change is evaluated by comparing the hourly potential emissions under maximum capacity immediately before the change to emissions at maximum capacity after the change. Under the General Provisions of the NSPS, only physical limitations on maximum capacity are considered in determining potential emissions. There is no change to the maximum capacity or hourly potential emissions based on the maximum capacity as a result of the proposed changes to the BC-2 Coater.
- (b) There are no National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 63, applicable to these facilities.

State Rule Applicability

326 IAC 2-1-3.4 (New Source Toxics Control)

This rule is not applicable to the BC-2 Coater because the coater was originally constructed in 1963 (prior to the June 29, 1998, applicability date of the rule), and because the proposed changes to the BC-2 Coater do not constitute a reconstruction.

326 IAC 2-2 (Prevention of Significant (PSD))

This modification is not a major modification pursuant to 326 IAC 2-2 because the source has agreed to limit future actual VOC emissions from the BC-2 Coater to 39 tons per year more than the baseline actual emissions for the line. This baseline will be based on the actual emissions data from 1992 and 1993 because voluntary control of the BC-2 Coater began in November 1993 and affected the actual emissions levels after that time such that they are no longer characteristic of the sources historical average yearly VOC emissions. The average actual annual emissions for the BC-2 Coater based on 1992 and 1993 emissions data is 446 tons per year. Therefore, the overall emissions limitation for the BC-2 Coating line will be 446 tons per year plus 39 tons per year, or 485 tons per year.

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons per year of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (Visible Emission Limitations)

Except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

The provisions of this rule do not apply because the BC-2 Coater is not a "new facility" as it was originally constructed in 1963.

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

This rule does not apply to the BC-2 Coater because the facility is located in Blackford County and was constructed in 1963, prior to the applicability date of January 1, 1980, specified in 326 IAC 8-2-1(a)(2).

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule does not apply because the BC-2 Coater is located in Blackford County and commenced operation prior to October 7, 1974 (the beginning of the applicability period specified in 326 IAC 8-6-1(2)).

No other 326 IAC 8 rules apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y. The proposed changes to the BC-2 Coater line will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The concentrations of these air toxics were modeled and found to be (in worst case possible) as follows:

Air Toxic Emissions

| Pollutant | Rate (lb/hr) | Limited Rate (ton/yr) | Modeled Concentration (Fg/m ³) | OSHA PEL (Fg/m ³) | % OSHA PEL |
|------------------------|--------------|-----------------------|--|-------------------------------|------------|
| Methyl Ethyl Ketone | 19.04 | 14.01 | 17.5 | 590000.0 | 0.003 |
| Methyl Isobutyl Ketone | 13.77 | 10.13 | 12.6 | 410000.0 | 0.003 |
| Toluene | 19.04 | 14.01 | 17.5 | 750000.0 | 0.002 |
| Xylene | 13.75 | 10.12 | 12.6 | 435000.0 | 0.003 |
| TOTAL HAPs | - | 48.27 | - | - | - |

Methodology: Rate ton/yr = (rate lb/hr)*(hr/yr of operation)

The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Conclusion

The construction and operation of the changes to the BC-2 Coater line will be subject to the conditions of the attached proposed **Construction Permit No. CP-009-9364-00004**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: 3M
 Source Location: 0304S-075E, Hartford City, Indiana, 47348
 County: Blackford
 Construction Permit No.: CP-009-9364-00004
 SIC Code: 2600
 Permit Reviewer: Janusz Johnson

On May 8, 1998, the Office of Air Management (OAM) had a notice published in the *News-Times*, Hartford, Indiana, stating that 3M had applied for a construction permit for modification and operation of the BC-2 Coater line with control. 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 June 23, 1998, the OAM determined that the following changes needed to be made to the FESOP:

1. To ensure the federal enforceability of limiting condition D.1.1 on Page 15 of 20 of the FESOP and better define how the limit restricts potential to emit (PTE), the following changes were made to Item (b):
 - (b) **The control system shall be operated at all times that coatings with volatile organic compound contents greater than or equal to 2.9 pounds per gallon are used.** For the purpose of determining compliance with the above equation, the overall control efficiency (c_{eff}) of the control system shall be considered to be 78.8 percent (%), ~~or a more appropriate value as demonstrated by the most recent stack test data,~~ provided the capture system and thermal oxidizer which make up the control system are operating in compliance with the monitoring provisions specified in Condition D.1.3.

Restricting potential to emit (PTE) in a federally enforceable manner requires that the limiting condition be structured in such a way that it is readily enforceable as a practical matter. Requiring that the control be operated for high VOC coatings helps to ensure that there is a definable and practical restriction of future PTE. Additionally, determining compliance with the equation set forth in Item (a) of this condition requires a fixed overall control efficiency be clearly specified in the permit. This overall control efficiency is based on a stack test which has demonstrated the capability of the capture and destruction system. Should a new stack test be performed in the future and it is necessary to redefine the overall control efficiency specified in the permit, the FESOP may be modified or amended as appropriate pursuant to 326 IAC 2-8-10 (Administrative Permit Amendments) and 326 IAC 2-8-11 (Permit Modification). Changes to the monitoring parameters specified in Condition D.1.3 will not require re-opening of the permit as discussed in the response to 3M's comments below.
2. To clarify the language in Item (c) of Condition D.1.1 to ensure that during the first month of operation the facilities shall be limited to one twelfth (1/12) of the total, and that during the first and second months of operation combined the facilities will be limited to two twelfths (2/12) of the total, etc., the following change needs to be made:

- (c) During the first twelve (12) months of operation, the controlled and uncontrolled input VOC usages shall be limited such that the potential to emit (PTE) VOCs based on equation (ii) shall not exceed **one twelfth (1/12) of** the limit specified in (a) ~~divided~~ **multiplied** by the accumulated months of operation.

On June 8, 1998, 3M submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded for emphasis):

Comment 1: Condition D.1.3(a) - The wording of this requirement should reflect the option to update the capture efficiency through a new stack test. The intent of this condition is not to require 79.4% capture efficiency, rather it is to ensure that whatever minimal operating conditions (in this case, minimum static pressures) that were documented when performance of the system was evaluated, continue to be followed and documented whenever "credit" for operation of the control system is to be claimed. In other words, if a new stack test is conducted, a new capture efficiency will be established under a different set of static pressure conditions. Whenever 3M wishes to take credit for reducing emissions through the operation of the pollution control system, these newly established minimal operating conditions (ie, static pressures) must be met.

3M suggests that the wording be changed to "...shall not be less than the static pressure required to achieve *the previously documented* seventy nine and four tenths percent (79.4%) capture of volatile organic compounds (VOC) emitted from the BC-2 Coater line *or a more appropriate static pressure as determined by the most recent stack test data.*

Response 1: The intent of this condition is to demonstrate that the capture system is operating in a manner consistent with a stack test in which a level of overall control efficiency was determined for the system. It is assumed that operating within the static pressure range defined in a stack test ensures that the overall control efficiency is being met continuously when the system is in operation. The OAM agrees with 3M that the condition language should be changed so that the results of the most recent stack test data can be used to demonstrate compliance. This change is consistent with the intent of the changes to Item (b) of Condition D.1.1 (above), therefore, Item (a) of Condition D.1.3 shall be modified as follows:

- (a) The static pressure of each capture system fan shall not be less than the static pressure required to achieve the **overall control efficiency specified in Condition D.1.1(b)** ~~seventy nine and four tenths percent (79.4%) capture of the volatile organic compounds (VOC) emitted from the BC-2 Coater line,~~ **or a more appropriate static pressure as determined by the most recent stack test data.**

Comment 2: Condition D.1.3(b) - The current wording of this condition implies that the temperature in the new stack test must demonstrate at least 99.3% destruction of the captured volatile organic compounds. The intent of this condition is not to require 99.3% destruction, rather it is to ensure that whatever minimal operating conditions (in this case, minimum thermal oxidizer temperature) that were documented when the performance of the system was evaluated, continue to be followed and documented whenever "credit" for operation of the control system is to be claimed. In other words, if a new stack test is conducted, a new destruction efficiency will be established under a different set of thermal oxidizer temperature conditions. Whenever 3M wishes to take credit for reducing emissions through the operation of the pollution control system, these newly established minimal operating conditions (ie, thermal oxidizer temperatures) must be met.

3M suggests that the wording be changed to "...the minimum operating temperature of 1,416 degrees Fahrenheit (°F), *which has been demonstrated to achieve ninety nine and three tenths percent (99.3%) destruction of captured volatile organic compounds (VOC), or a more appropriate temperature and destruction efficiency as determined by the most recent stack test data.*"

Response 2: The OAM agrees with 3M that the language of this condition should be revised. The intent of the condition is to establish a minimum operating temperature which demonstrates that the thermal oxidizer is maintaining the overall control efficiency specified in Condition D.1.1(b). While the overall control efficiency must be clearly specified in the permit, as discussed previously in this addendum, the intent was not to require a minimum destruction efficiency. Therefore, Item (b) of Condition D.1.3 shall be revised as follows:

- (b) The thermal oxidizer shall operate above the minimum operating temperature of 1,416 degrees Fahrenheit (°F), or a more appropriate temperature ~~and destruction efficiency~~ as determined by the most recent stack test data, which has been demonstrated to achieve **the overall control efficiency specified in Condition D.1.1(b)** ~~at least ninety nine and three tenths percent (99.3%) destruction of captured volatile organic compounds (VOC).~~

Additionally, on July 2, 1998, 3M submitted a comment on the changes to condition D.1.1 made by the OAM on June 23, 1998, as described previously in this addendum. A summary of the comment and corresponding response follows:

Comment: 3M would like to add language to clarify the operation of a critical safety operating procedure of the coating line exhaust system. For the coating head enclosure and each oven zone, a purge stack damper exists or will be installed. The purge stack damper is normally closed to atmosphere, but must be "exercised" regularly to ensure that it maintains reliability, as it is designed to open in an emergency to vent vapors away from the process, equipment, and personnel. Were it not for an "exercise" program, it would be possible that, after prolonged periods when the damper is shut, the purge stack damper may not open when needed, creating an explosive situation. Such an "exercise" would last from 30 seconds to one minute and would be required a minimum of once per 24 hour period. The dampers are usually exercised between product runs, and the stack dampers are exercised during coating only when a product run extends beyond 24 hours. As a result of this required safety procedure, 3M requests that IDEM add a sentence to the permit to clarify that such stack damper "exercises" are allowed.

Additionally, a record keeping requirement under section D.1.5 should be added to reflect this change.

Response: The following language shall be added to Item (b) of Condition D.1.1, which was previously revised in this addendum:

- (b) The control system shall be operated at all times that coatings with volatile organic compound contents greater than or equal to 2.9 pounds per gallon are used. For the purpose of determining compliance with the above equation, the overall control efficiency (c_{eff}) of the control system shall be considered to be 78.8 percent (%) provided the capture system and thermal oxidizer which make up the control system are operating in compliance with the monitoring provisions specified in Condition D.1.3. **A fifteen (15) minute period per calendar month shall be allowed to exercise the purge stack dampers provided that a monthly summary including the time and date of each exercising period is recorded and submitted to the OAM upon request.**

Also, Condition D.1.5 (Record Keeping Requirements) Item (a) on Page 17 of 20 of the FESOP shall be changed as follows to incorporate the new record keeping language:

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be determined at least monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.
- (1) The amount and VOC content of each coating material used when the control system is not operating, and the amount and VOC content of each coating material used when the control system is operating. 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 usage weighted VOC content of the coatings used for each period that the control system is not in operation, and the usage weighted VOC content of the coatings used for each period that the control system is in operation;
 - (4) The total VOC usage for each period that the control system is not in operation, and the total VOC usage for each period that the control system is in operation; and
 - (5) The weight of VOCs emitted each month as calculated according to equation (i) of Condition D.1.1.
 - (6) A log of the dates and times of each purge stack damper exercising period.**

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

3M
Bldg 42-2E-27
P.O. Box 33331
St. Paul, MN 55133-3331

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that 3M, 0304S-075E, Hartford City, Indiana, 47348, has constructed the modifications to the BC-2 Coater line in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on January 9, 1998, and as permitted pursuant to **Construction Permit No. CP-009-9364, Plant ID No. 009-00004** issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 19 _____.
My Commission expires: _____

Signature

Name (typed or printed)