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

ChromaSource, Inc.
Suite 1206, International Park
2701 South Coliseum Boulevard
Fort Wayne, Indiana 46803-2950

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F003-9663-00240	
Issued by: Paul Dubenetzky, Branch Chief 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 2-8-3(b)]

The Permittee owns and operates a stationary coated and laminated paper color sample manufacturing operation.

Responsible Official:	Steven A. Scherf
Source Address:	Suite 1206, International Park 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
Mailing Address:	Suite 1206, International Park 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
SIC Code:	2672
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

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

(1) One (1) paper coating line (ID Coater No. 1), using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1);

(2) One (1) paper coating line (ID Coater No. 2), using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with the existing catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1);

(3) One (1) container cleaning operation, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with the existing catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1); and

(4) One (1) catalytic oxidizer (ID Oxidizer No. 1), with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from two (2) paper coating lines and a container cleaning operation, exhausting through one (1) stack (ID No. 1).

Note: Coater No. 1 is being modified under ENSR to increase its maximum coating usage capacity from 9.9 gallons per hour to 50 gallons per hour.

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

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

(1) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
(1) nine (9) space heaters, each rated at 0.25 MMBtu per hour;
(2) one (1) dryer for Coater #1 (ID Dryer #1), rated at 1.5 MMBtu per hour;
Note: the following units are new units being added to the source:
(3) one (1) dryer for Coater #2 (ID Dryer #2), rated at 1.5 MMBtu per hour; and
(4) one (1) air make-up unit, rated at 0.5 MMBtu per hour.

(2) Combustion source flame safety purging on startup;

(5) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(6) Paved and unpaved roads and parking lots with public access; and

(7) Paper cutting operations which cut the sheets of color samples to the proper size, with PM emissions less than 5 pounds per hour or 25 pounds per day.

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

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

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) 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.

SECTION B GENERAL CONDITIONS

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. 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, 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 Order Issuance [326 IAC 2-8-5(b)]

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

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

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

(a) The Permittee shall annually 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

(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 the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each 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.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

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

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) 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, IN 46206-6015

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

(1) A timely renewal application is one that is:

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

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

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

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

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

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

B.21 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 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.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

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

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

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

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

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

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

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. 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.25 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. 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.26 Enhanced New Source Review [326 IAC 2]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

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

C.2 Opacity [326 IAC 5-1]

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

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

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

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

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

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

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

All air pollution control equipment listed in this permit 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 2-8-4(3)]

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee 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, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for 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.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(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.11 Monitoring Methods [326 IAC 3]

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

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

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

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

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

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

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(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 2-8-4(3)]

C.15 Monitoring Data Availability

(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 in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

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

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

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

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

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

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

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

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

Stratospheric Ozone Protection

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

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

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) One (1) paper coating line (ID Coater No. 1), using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1);

(b) One (1) paper coating line (ID Coater No. 2), using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with the existing catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1);

(c) One (1) container cleaning operation, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with the existing catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1); and

(d) One (1) catalytic oxidizer (ID Oxidizer No. 1), with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from two (2) paper coating lines and a container cleaning operation, exhausting through one (1) stack (ID No. 1).

Insignificant Activities

(a) one (1) dryer for Coater #1 (ID Dryer #1), rated at 1.5 MMBtu per hour; and
(b) one (1) dryer for Coater #2, (ID Dryer #2), rated at 1.5 MMBtu per hour.

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

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

(a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coatings applied to paper in the two (2) paper coating lines (ID Coater No. 1 and Coater No. 2) by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating less water delivered to the applicator.

(b) In order to comply with this VOC limit, the catalytic oxidizer (ID Oxidizer No. 1) shall operate at all times that the two (2) coating lines and the two (2) dryers (ID Dryer #1 and Dryer #2) are in operation and shall maintain a minimum overall control efficiency of 77%.

D.1.2 Permanent Total Enclosure

Pursuant to CP-003-5253-00240, issued on March 25, 1996, the VOC capture system shall meet the following criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:

(a) Any natural draft opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

(b) The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.

(c) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters per hour (200 feet per minute). The direction of air through all NDOs shall be into the enclosure.

(d) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c), shall be closed during routine operation of the process.

(e) All VOC emissions must be captured and contained for discharge through a control device.

D.1.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) The solvent input of VOC to the two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning process shall be limited to 1,980 tons of VOC per twelve (12) consecutive month period, rolled on a monthly basis. The catalytic oxidizer shall maintain a minimum control efficiency of 95%. This will limit VOC emissions to less than 100 tons per year.

(b) The solvent input of a single HAP to the two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning process shall be limited to 200 tons of a single HAP per twelve (12) consecutive month period, rolled on a monthly basis. The catalytic oxidizer shall maintain a minimum control efficiency of 95%. This will limit emissions of any single HAP to less than 10 tons per year.

(c) The solvent input of a combination of HAPs to the two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning process shall be limited to 500 tons of a combination of HAPs per twelve (12) consecutive month period, rolled on a monthly basis. The catalytic oxidizer shall maintain a minimum control efficiency of 95%. This will limit emissions of a combination of HAPs to less than 25 tons per year.

(d) The catalytic oxidizer (ID Oxidizer #1) shall be operated at all times that the two (2) paper coating lines and the container cleaning process are in operation.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform VOC testing on the catalytic oxidizer (Oxidizer #1) to verify that the VOC capture system meets the criteria of a permanent total enclosure and that the catalytic oxidizer is maintaining a minimum control efficiency of 95% to show compliance with conditions D.1.1, D.1.2, and D.1.3, utilizing methods as approved by the Commissioner. 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.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 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.1.7 VOC and HAP Emissions

Compliance with Condition D.1.3 shall be demonstrated at the end of each month based on the total volatile organic compound, single HAP, and total HAP usage for the most recent twelve (12) month period.

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

D.1.8 Monitoring

(a) When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550° F or a temperature determined in the compliance tests to maintain a minimum 95% destruction of the volatile organic compound (VOC) captured.

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

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.3, 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 and HAP usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.3.

(1) The amount and VOC and HAP 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 and HAP content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC, single HAP, and total HAP usage for each month; and

(6) The weight of VOCs, single HAP, and total HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of minimum operating temperature, fan amperage and duct velocity for the catalytic oxidizer and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(b) One (1) paper coating line (ID Coater No. 2), using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with the existing catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1); and

(c) One (1) container cleaning operation, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with the existing catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1).

Insignificant Activities

(c) one (1) dryer for Coater #2 (ID Dryer #2), rated at 1.5 MMBtu per hour; and
(d) one (1) air make-up unit, rated at 0.5 MMBtu per hour.

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

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to:

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

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

Operation Conditions

See section D.1 for Operation Conditions

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: ChromaSource, Inc.
Source Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
Mailing Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
FESOP No.: F003-9663-00240

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

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

Source Name: ChromaSource, Inc.
Source Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
Mailing Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
FESOP No.: F003-9663-00240

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
Source Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
Mailing Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
FESOP No.: F003-9663-00240
Facility: two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning operation
Parameter: Volatile Organic Compounds (VOC)
Limit: The solvent input of VOC to the two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning process shall be limited to 1,980 tons of VOC per twelve (12) consecutive month period, rolled on a monthly basis. The catalytic oxidizer shall maintain a minimum control efficiency of 95%.

YEAR: _____

Month	VOC Usage This Month (tons)	VOC Usage Previous 12 Months (tons)

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
Source Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
Mailing Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
FESOP No.: F003-9663-00240
Facility: two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning operation
Parameter: Hazardous Air Pollutants (HAPs)
Limit: The solvent input of a single HAP to the two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning process shall be limited to 200 tons per twelve (12) consecutive month period, rolled on a monthly basis. The catalytic oxidizer shall maintain a minimum control efficiency of 95%.

YEAR: _____

Month	Single HAP Usage This Month (tons)	Single HAP Usage Previous 12 Months (tons)

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

FESOP Quarterly Report

Source Name: ChromaSource, Inc.
Source Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
Mailing Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
FESOP No.: F003-9663-00240
Facility: two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning operation
Parameter: Hazardous Air Pollutants (HAPs)
Limit: The solvent input of any combination of HAPs to the two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning process shall be limited to 500 tons per twelve (12) consecutive month period, rolled on a monthly basis. The catalytic oxidizer shall maintain a minimum control efficiency of 95%.

YEAR: _____

Month	Total Combined HAPs Usage This Month (tons)	Total Combined HAPs Usage Previous 12 Months (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

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

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

Source Name: ChromaSource, Inc.
Source Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
Mailing Address: Suite 1206, International Park, 2701 S. Coliseum Blvd., Fort Wayne IN 46803
FESOP No.: F003-9663-00240

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

Source Background and Description

Source Name:	**ChromaSource, Inc.**
Source Location:	**Suite 1206, International Park**
	2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
County:	**Allen**
SIC Code:	**2672**
Operation Permit No.:	**F003-9663-00240**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from ChromaSource, Inc. relating to the operation of a coated and laminated paper color sample manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

(1) One (1) paper coating line (ID Coater No. 1), using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with a catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1); and

(2) One (1) catalytic oxidizer (ID Oxidizer No. 1), with a maximum rated heat input capacity of 13.6 million (MM) British thermal units per hour (Btu), including natural gas and solvents, controlling VOC emissions from two (2) paper coating lines and a container cleaning operation, exhausting through one (1) stack (ID No. 1).

Note: Coater No. 1 is being modified under ENSR to increase its maximum coating usage capacity from 9.9 gallons per hour to 50 gallons per hour.

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

The application includes information relating to the construction and operation of the following equipment:

(1) One (1) paper coating line (ID Coater No. 2), using a knife-over-roll coating application system, using a maximum of 50 gallons of coating per hour, with the existing catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1);

and

(2) One (1) container cleaning operation, where empty paint containers are sprayed with cleaning solvent and manually cleaned with a brush, using a maximum of 5 pounds per hour of cleaning solvent, with the existing catalytic oxidizer (ID Oxidizer No. 1) for VOC control, exhausting through one (1) stack (ID No. 1).

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 million (10,000,000) Btu per hour, including the following:
(a) nine (9) space heaters, each rated at 0.25 MMBtu per hour;
(b) one (1) dryer for Coater #1 (ID Dryer #1), rated at 1.5 MMBtu per hour;
Note: the following units are new units being added to the source:
(c) one (1) dryer for Coater #2 (ID Dryer #2), rated at 1.5 MMBtu per hour; and
(d) one (1) air make-up unit, rated at 0.5 MMBtu per hour.

(2) Combustion source flame safety purging on startup;

(3) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(4) Paved and unpaved roads and parking lots with public access; and

(5) Paper cutting operations which cut the sheets of color samples to the proper size, with PM emissions less than 5 pounds per hour or 25 pounds per day.

Existing Approvals

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

(1) CP 003-5253-00240, issued on March 25, 1996.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on April 8, 1998.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (7 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	1.09
PM-10	1.09
SO_2	0.02
VOC	2,340.26
CO	2.81
NO_x	10.76

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)
Xylene	289.19
Toluene	327.27
Methyl Ethyl Ketone	461.89
Ethylbenzene	60.25
TOTAL	1138.60

(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) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

(d) 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.

Limited Potential to Emit

(a) The source has accepted a federally enforceable limit on potential to emit VOC of less than 100 tons per year, consisting of:

(i) 51.0 tons per year for the significant activities; and

(ii) 0.2 tons per year for the insignificant activities.

(b) The source has accepted a limit on potential to emit of less than 10 tons per year for any single HAP and less than 25 tons per year for any combination of HAPs.

(c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Surface Coating	0.0	0.0	0.0	49.7	0.0	0.0	9.9	24.3
Container Cleaning	0.0	0.0	0.0	1.1	0.0	0.0	0.28	0.28
Catalytic Oxidizer	0.8	0.8	0.0	0.2	2.1	8.3	0.0	0.0
Insignificant Activities	0.3	0.3	0.0	0.2	0.7	2.5	0.0	0.0
Total Emissions	1.1	1.1	0.0	51.2	2.8	10.8	9.9	24.6

County Attainment Status

The source is located in Allen 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 (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, applicable to this source.

State Rule Applicability - Entire Source

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

The source has submitted a Preventive Maintenance Plan (PMP) on April 8, 1998. 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)

This source is not subject to the requirements of 326 IAC 2-2 (PSD) because the source is located in Allen County, the federally enforceable limited potential to emit of any pollutant is less than 250 tons per year, and the source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source has accepted federally enforceable operation conditions which limit emissions of VOC to below 100 tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the usage of VOC, any single HAP, and total HAPs in the two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning process shall be limited to 1,980, 200, and 500 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Also, the catalytic oxidizer (ID Oxidizer #1) shall maintain a minimum control efficiency of 95% and shall be operated at all times that the two (2) paper coating lines and the container cleaning process are in operation. This will limit source wide VOC, single HAP, and total HAP emissions are less than 100, 10, and 25 tons per year, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Visible Emissions Limitations)

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

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

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

The two (2) paper coating lines (ID Coater #1 and Coater #2) are subject to the requirements of 326 IAC 8-2-5. Pursuant to this rule, the volatile organic compound (VOC) content of coating delivered to the coating applicator from a paper coating line shall be limited to 2.9 pounds of VOCs per gallon of coating excluding water.

The worst case coating that will be used in the two (2) paper coating lines contains 5.29 pounds of VOC per gallon of coating less water, which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. However, the source will use the existing catalytic oxidizer (ID Oxidizer #1) to control VOC emissions in order to achieve this emission limitation.

Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the use of the catalytic oxidizer, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

$$E = \frac{L}{1 - L / D}$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating
= 2.9 pounds VOC per gallon of coating less water
D = Density of VOC in coating in pounds per gallon of VOC.
= 7.36 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied
= 4.79 pounds VOC per gallon of coating solids

Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the capture system and control device, as a percentage, needed in order to meet the emission limitation is determined by the following equation:

$$O = \frac{V - E}{V} \times 100$$

where: V = The actual VOC content of the coating in pounds of VOC per gallon of coating solids as applied
= 20.34 pounds VOC per gallon of coating solids
E = 4.79 pounds VOC per gallon of coating solids
O = Equivalent overall control efficiency of the capture system and control device as a percentage
= 76.45%

The VOC capture system for the two (2) coating lines meets the criteria for permanent total enclosure, therefore, the capture efficiency is 100%. The catalytic oxidizer control efficiency is 95%.

The source is in compliance with the emission limit of 2.9 pounds VOC per gallon of coating less water under 326 IAC 8-2-5, since the catalytic oxidizer has an overall control efficiency of 95%, which exceeds the required control efficiency of 76.45%.

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

The container cleaning operation is not subject to the requirements of 326 IAC 8-1-6 because it has potential VOC emissions less than 25 tons per year.

Compliance Requirements

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

Compliance Determination Requirements in 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 two (2) paper coating lines (ID Coater #1 and Coater #2), the container cleaning process, and the catalytic oxidizer (ID Oxidizer #1) have applicable compliance monitoring conditions as specified below:

   (a) The usage of VOC, any single HAP, and total HAPs in the two (2) paper coating lines (ID Coater #1 and Coater #2) and the container cleaning process shall be limited to 1,980, 200, and 500 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Also, the catalytic oxidizer (ID Oxidizer #1) shall maintain a minimum control efficiency of 95% and shall be operated at all times that the two (2) paper coating lines and the container cleaning process are in operation.

   (b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC, single HAP and total HAP usage for the two (2) paper coating lines and the container cleaning process.

   (c) When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550° F or a temperature, fan amperage and duct velocity determined in the compliance tests to maintain a minimum 95% destruction of the volatile organic compound (VOC) captured.

   These monitoring conditions are necessary because the catalytic oxidizer must operate properly to ensure compliance with 326 IAC 8-2-5 (Paper Coating Operations) and 326 IAC 2-8 (FESOP).

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) FESOP Application Form GSD-08.

(a) This source has accepted federally enforceable air toxic emission limits of less than 10 tons per year for any single HAP and less than 25 tons per year for any combination of HAPs.

Conclusion

The operation of this coated and laminated paper color sample manufacturing operation shall be subject to the conditions of the attached proposed **FESOP No. F003-9663-00240.**

Indiana Department of Environmental Management
Office of Air Management

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

Source Name:	**ChromaSource, Inc.**
Source Location:	**Suite 1206, International Park** **2701 South Coliseum Blvd.** **Fort Wayne, Indiana 46803-2950**
SIC Code:	**2672**
County:	**Allen**
Operation Permit No.:	**F003-9663-00240**
Permit Reviewer:	**Trish Earls/EVP**

On July 15, 1998, the Office of Air Management (OAM) had a notice published in the Ft. Wayne Gazette/New Sentinel, Fort Wayne, Indiana, stating that ChromaSource, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a coated and laminated paper color sample manufacturing operation. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

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

1. Condition A.5 (Prior Permit Conditions) is a new condition which has been added to the FESOP. The condition reads as follows:

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) 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.

2. Condition B.27 (Credible Evidence) has been removed from the FESOP pending further negotiations with the US EPA.

3. Condition D.1.5 of the FESOP has been revised to clarify the purpose of the stack testing on the catalytic oxidizer. The condition is revised to read as follows (new text in bold):

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform VOC testing on the catalytic oxidizer (Oxidizer #1) **to verify that the VOC capture system meets the criteria of a permanent total enclosure and that the catalytic oxidizer is maintaining a minimum control efficiency of 95% to show compliance with conditions D.1.1, D.1.2, and D.1.3,** utilizing methods as approved by the Commissioner. 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.

On July 21, 1998, David Hughes submitted comments on the proposed FESOP on behalf of ChromaSource, Inc. The summary of the comments and corresponding responses is as follows:

Comment #1

The Compliance Monitoring Requirements, Section D.1.8 in the proposed permit, should be changed. The fan in the oxidizer system is variable speed, and automatically adjusts to maintain proper destruction temperatures. Therefore, fan amperage and duct velocity will vary, and single amperage or velocity will not be indicative of proper operation, and are therefore not effective surrogate parameters to monitor. Temperature will be monitored and recorded at all times.

I request that the reference to fan amperage and duct velocity be removed from Section D.1.8, and that minimum operating temperature be retained as the monitored parameter.

Response #1

Since fan amperage and duct velocity would not be effective parameters to monitor to indicate proper operation of the catalytic oxidizer, Condition D.1.8 has been revised so that references to these parameters for compliance monitoring are removed. The condition now reads as follows (changes in strikeout):

D.1.8 Monitoring

(a) When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550° F or a temperature~~, fan amperage and duct velocity~~ determined in the compliance tests to maintain a minimum 95% destruction of the volatile organic compound (VOC) captured.

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

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

ChromaSource, Inc.
Suite 1206, International Park
2701 South Coliseum Blvd.
Fort Wayne, Indiana 46803-2950

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 ChromaSource, Inc., Suite 1206, International Park, 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803, has constructed the paper coating line (ID Coater #2), the container cleaning operation, the natural gas fired dryer (ID Dryer #2), and the air-make up unit in conformity with the requirements and intent of the Federally Enforceable State Operating Permit (FESOP) application received by the Office of Air Management on April 8, 1998 and as permitted pursuant to **FESOP No. F-003-9663, Plant ID No. 003-00240** 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)

Appendix A: Emission Calculations

Company Name: ChromaSource, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
FESOP: F003-9663
Plt ID: 003-00240
Reviewer: Trish Earls/EVP
Date: June 12, 1998

Total Potential To Emit (tons/year)

	Emissions Generating Activity				
Pollutant	Surface Coating	Container Cleaner	Catalytic Oxidizer Combustion	Insignificant Activities*	**TOTAL**
PM	0.00	0.00	0.80	0.29	1.09
PM10	0.00	0.00	0.80	0.29	1.09
SO2	0.00	0.00	0.00	0.02	0.02
NOx	0.00	0.00	8.30	2.46	10.76
VOC	2317.82	22.04	0.20	0.20	2340.26
CO	0.00	0.00	2.10	0.71	2.81
total HAPs	1133.09	5.51	0.00	0.00	1138.60
worst case single HAP	461.89	5.51	0.00	0.00	461.89

Total emissions based on rated capacities at 8,760 hours/year.
*Insignificant Activity Emissions represent emissions from natural gas combustion.
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

Limited Potential To Emit (tons/year)

	Emissions Generating Activity				
Pollutant	Surface Coating	Container Cleaner	Catalytic Oxidizer Combustion	Insignificant Activities*	**TOTAL**
PM	0.00	0.00	0.80	0.29	1.09
PM10	0.00	0.00	0.80	0.29	1.09
SO2	0.00	0.00	0.00	0.02	0.02
NOx	0.00	0.00	8.30	2.46	10.76
VOC	49.69	1.10	0.20	0.20	51.19
CO	0.00	0.00	2.10	0.71	2.81
total HAPs	24.30	0.28	0.00	0.00	24.58
worst case single HAP	9.90	0.28	0.00	0.00	9.90

Total emissions based on rated capacities at 8,760 hours/year.
*Insignificant Activity Emissions represent emissions from natural gas combustion.
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

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

Company Name: ChromaSource, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
Operation Permit No.: F003-9663
Plt ID: 003-00240
Reviewer: Trish Earls/EVP
Date: June 12, 1998

Material	Density (Lb/Gal)	Weight % Volatile (H20& 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
CSI-Coater #1																
CSI Color Card Lacquer NAD0351	9.08	58.24%	0.0%	58.2%	0.0%	26.00%	1.00	50.0	5.29	5.29	264.39	6345.29	1158.01	0.00	20.34	100%
CSI Color Card Lacquer NAB0540	9.17	56.57%	0.0%	56.6%	0.0%	26.98%	1.00	50.0	5.19	5.19	259.37	6224.96	1136.06	0.00	19.23	100%
Generic Wash Solvent	6.80	100.00%	0.0%	100.0%	0.0%	0.00%	1.00	0.03	6.80	6.80	0.20	4.90	0.89	0.00	N/A	100%
CSI-Coater #2																
CSI Color Card Lacquer NAD0351	9.08	58.24%	0.0%	58.2%	0.0%	26.00%	1.00	50.0	5.29	5.29	264.39	6345.29	1158.01	0.00	20.34	100%
CSI Color Card Lacquer NAB0540	9.17	56.57%	0.0%	56.6%	0.0%	26.98%	1.00	50.0	5.19	5.19	259.37	6224.96	1136.06	0.00	19.23	100%
Generic Wash Solvent	6.80	100.00%	0.0%	100.0%	0.0%	0.00%	1.00	0.03	6.80	6.80	0.20	4.90	0.89	0.00	N/A	100%
Total State Potential Emissions:											**529.18**	**12700.36**	**2317.82**	**0.00**		

Federal Potential Emissions (controlled):

	Coating Usage Limitation VOC	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Total Federal Potential Emissions:	42.88%	95.00%	N/A	**11.35**	**272.30**	**49.69**	**0.00**

NOTE:
Coatings are mutually exclusive.
VOC emissions are controlled by a catalytic oxidizer with a control efficiency of 95%.
At a 42.88% annual coating usage limitation, the potential VOC emissions are limited to less than 100 tons per year, the potential single HAP emissions are limited at less than 10 tons/yr, and the total HAP emissions are limited at less than 25 tons/yr, therefore, 326 IAC 2-7 does not apply.

METHODOLOGY

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

Appendix A: Emissions Calculations
HAP Emission Calculations

Company Name: ChromaSource, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
Operation Permit No.: F003-9663
Plt ID: 003-00240
Reviewer: Trish Earls/EVP
Date: June 12, 1998

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone (MEK)	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
CSI-Coater #1											
CSI Color Card Lacquer NAD0351	9.08	1.00	50.0	7.20%	8.00%	11.50%	1.50%	143.17	159.08	228.68	29.83
CSI Color Card Lacquer NAB0540	9.17	1.00	50.0	7.20%	8.00%	11.50%	1.50%	144.59	160.66	230.95	30.12
Generic Wash Solvent	6.80	1.00	0.03	0.00%	25.00%	0.00%	0.00%	0.00	0.22	0.00	0.00
CSI-Coater #2											
CSI Color Card Lacquer NAD0351	9.08	1.00	50.0	7.20%	8.00%	11.50%	1.50%	143.17	159.08	228.68	29.83
CSI Color Card Lacquer NAB0540	9.17	1.00	50.0	7.20%	8.00%	11.50%	1.50%	144.59	160.66	230.95	30.12
Generic Wash Solvent	6.80	1.00	0.03	0.00%	25.00%	0.00%	0.00%	0.00	0.22	0.00	0.00
CSI Container Cleaner #1											
Generic Wash Solvent	6.80	0.74	1.00	0.00%	25.00%	0.00%	0.00%	0.00	5.51	0.00	0.00
								289.19	**327.27**	**461.89**	**60.25**

Total HAPs: **1138.60**

Coating Usage Limitation HAP	Control Efficiency: VOC/HAP	Controlled Xylene Emissions (tons/yr)	Controlled Toluene Emissions (tons/yr)	Controlled MEK Emissions (tons/yr)	Controlled Ethylbenzene Emissions (tons/yr)
42.88%	95.00%	**6.20**	**7.19**	**9.90**	**1.29**

Total HAPs: **24.58**

NOTE:
At a 42.88% annual coating usage limitation, the potential single HAP emissions are limited at less than 10 tons/yr, and the total HAP emissions are limited at less than 25 tons/yr, therefore, 326 IAC 2-7 does not apply.

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 * Material Usage Limitation (%)

Appendix A: Emissions Calculations
VOC Emissions
From Container Cleaner

Company Name: ChromaSource, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
Operation Permit No.: F003-9663
Plt ID: 003-00240
Reviewer: Trish Earls/EVP
Date: June 12, 1998

Material	Density (Lb/Gal)	Weight % Volatile (H20& 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
CSI Container Cleaner #1																
Generic Wash Solvent	6.80	100.00%	0.0%	100.0%	0.0%	0.00%	0.74	1.00	6.80	6.80	5.03	120.77	22.04	0.00	N/A	100%
Total State Potential Emissions:											**5.03**	**120.77**	**22.04**	**0.00**		

Federal Potential Emissions (controlled):

	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Federal Potential Emissions:	95.00%	N/A	**0.25**	**6.04**	**1.10**	**0.00**

NOTE:
VOC emissions are controlled by a catalytic oxidizer with a control efficiency of 95%.

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)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
10 < MM BTU/HR <100
Catalytic Oxidizer

Company Name: ChromaSource, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
Operation Permit No.: F003-9663
Plt ID: 003-00240
Reviewer: Trish Earls/EVP
Date: June 12, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
13.6	119.1

Heat Input Capacity includes:
One (1) catalytic oxidizer, rated at 13.6 MMBtu/hr.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	14.0	14.0	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.8	0.8	0.0	8.3	0.2	2.1

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: Uncontrolled = 140, Low NOx burner = 83, Flue gas recirculation = 30
Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 34
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr < 0.3

Company Name: ChromaSource, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
Operation Permit No.: F003-9663
Plt ID: 003-00240
Reviewer: Trish Earls/EVP
Date: June 12, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.3	19.7

Heat Input Capacity includes:
Nine (9) space heaters, each rated at 0.25 MBtu/hr.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.17	11.17	0.6	94.0	11.0	40.0
Potential Emission in tons/yr	0.11	0.11	0.01	0.93	0.11	0.39

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, Residential Furnaces (no SCC)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

Company Name: ChromaSource, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, Indiana 46803-2950
Operation Permit No.: F003-9663
Plt ID: 003-00240
Reviewer: Trish Earls/EVP
Date: June 12, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.5	30.7

Heat Input Capacity includes:
One (1) air make up unit, rated at 0.5 MMBtu/hr, and two (2) dryers for paper coating, each rated at 1.5 MMBtu/hr.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.18	0.18	0.01	1.53	0.09	0.32

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36
Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton