



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)

for Royal Adhesives & Sealants, LLC in St. Joseph County

MSOP NSC No.: M141-43237-00615

The Indiana Department of Environmental Management (IDEM) has received an application from Royal Adhesives & Sealants, LLC, located at 1915 N. Bendix Drive, South Bend, Indiana 46628, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Royal Adhesives & Sealants, LLC to construct and operate a new stationary general warehousing and storage adhesives and sealants and aerosol packaging operation.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings have been sent to:

St. Joseph County Public Library
304 S. Main Street
South Bend, IN 46601

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM's website (<https://www.in.gov/idem/5474.htm>) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M141-43237-00615 in all correspondence.

Comments should be sent to:

Michaela Hecox
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Michaela Hecox or (317) 233-3031
Or dial directly: (317) 233-3031
Fax: (317) 232-6749 attn: Michaela Hecox
E-mail: MHecox@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, IDEM Northern Regional Office, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Michaela Hecox or my staff at the above address.


Brian Williams, Section Chief
Permits Branch
Office of Air Quality



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

DRAFT

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

Royal Adhesives & Sealants, LLC
1915 N. Bendix Drive
South Bend, Indiana 46628

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M141-43237-00615	
Master Agency Interest ID: 127500	
Issued by:	Issuance Date:
Brian Willams, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary general warehousing and storage and adhesives and aerosol packaging operation.

Source Address:	1915 N. Bendix Drive, South Bend, Indiana 46628
General Source Phone Number:	(574) 246-5381
SIC Code:	4225 (General Warehousing and Storage) 2891 (Adhesives and Sealants)
County Location:	St Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) aerosol canister filling lines, identified as CFL1 and CFL2, approved in 2020 for construction, each with a maximum capacity of 150 canisters per hour, uncontrolled, and exhausting to stack S-01.
- (b) One (1) manual aerosol canister filling line, identified as MFL1, approved in 2020 for construction, with a maximum capacity of 2 canisters per hour, uncontrolled, and exhausting to stack S-01.
- (c) One (1) aerosol can filling line, identified as CFL3, approved in 2020 for construction, with a maximum capacity of 900 cans per hour, uncontrolled, and exhausting to stack S-02.
- (d) Two (2) cold parts cleaner, identified as CPC1 and CPC2, approved in 2020 for construction, each with a maximum capacity of 55 gallons of cleaning solvent, uncontrolled, and exhausting indoors.
- (e) Bulk pressure vessels containing various propellants used in the filling operations that consists of the following:
 - (1) One (1) bulk pressure vessel containing Dimethyl Ether, identified as PT1, approved in 2020 for construction, uncontrolled, and with no exhaust.
 - (2) One (1) bulk pressure vessel containing R134A, identified as PT2, approved in 2020 for construction, uncontrolled, and with no exhaust.
 - (3) One (1) bulk pressure vessel containing Duracool 12a Refrigerant, identified as PT3, approved in 2020 for construction, uncontrolled, and with no exhaust.

- (4) One (1) bulk pressure vessel containing carbon dioxide (CO₂), identified as PT4, approved in 2020 for construction, uncontrolled, and with no exhaust.
- (5) One (1) bulk pressure vessel containing nitrogen (N), identified as PT5, approved in 2020 for construction, uncontrolled, and with no exhaust.

Note: There are no associated emissions with the bulk pressure vessels as they have been designed to operate without emission even during the loading process.

- (f) One (1) small aerosol can testing station for Quality Assurance/Quality Control, identified as QA/QC, approved in 2020 for construction, with a maximum capacity of 9,855 cans tested per year, uncontrolled, and exhausting outdoors.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M141-43237-00615, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability

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

B.7 Severability

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.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification 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, OAQ on or before the date it is due.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M141-43237-00615 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:

- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
- (2) 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, OAQ on or before the date it is due.
- (c) 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 2-6.1 until IDEM, OAQ 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 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).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (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(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

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. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

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

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) 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, OAQ on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) aerosol canister filling lines, identified as CFL1 and CFL2, approved in 2020 for construction, each with a maximum capacity of 150 canisters per hour, uncontrolled, and exhausting to stack S-01.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (a) The total VOC emissions from the one (1) aerosol canister filling line (CFL1) shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The total VOC emissions from the one (1) aerosol canister filling line (CFL2) shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from each of the two (2) aerosol canister filling lines (CFL1 and CFL2), and shall render the requirements of 326 IAC 8-1-6 not applicable to the two (2) aerosol canister filling lines (CFL1 and CFL2).

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these aerosol canister filling lines and their associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 VOC Emissions

In order to demonstrate compliance with Condition D.1.1, the Permittee shall determine monthly VOC emissions from the each of the two (2) aerosol canister filling lines (CFL1 and CFL2) according to the following formula:

$$E = [(Q_{adh} \times Q_{gal}) + (Q_{prop} \times Q_{can})] / 2000$$

Where:

E = VOC emissions (tons/month)
Q_{adh} = Total pounds of VOC per gallon filled (0.005 pounds VOC/gallon)

- Q_{gal} = Total gallons filled per month (gallons/month)
 Q_{prop} = Total pounds of VOC per canister filled (0.02 pounds VOC/canister)
 Q_{can} = Total canisters filled per month (canisters/month)

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below for the two (2) aerosol canister filling lines (CFL1 and CFL2). Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1:
- (1) The amount and VOC content of the volatile organic liquid (VOL) adhesive filled in canisters. Records shall include material safety data sheets (MSDS), product formulation information, and company product records necessary to verify the type and amount used;
 - (2) The total gallons filled per month;
 - (3) The amount and VOC content of the volatile organic liquid (VOL) propellant filled in canisters. Records shall include material safety data sheets (MSDS), product formulation information, and company product records necessary to verify the type and amount used;
 - (4) The total canisters filled per month;
 - (5) The weight of VOC emitted for each month.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.6 Reporting Requirement

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Two (2) cold parts cleaner, identified as CPC1 and CPC2, approved in 2020 for construction, each with a maximum capacity of 55 gallons of cleaning solvent, uncontrolled, and exhausting indoors.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-3-2] [326 IAC 8-3-8]

In order to render the requirements of 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements) and 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers) not applicable, the VOC emissions from the cold parts cleaners shall be less than fifteen (15) pounds per day of VOC. The amount of VOC in waste shipped offsite may be deducted from the reported daily VOC usage.

Compliance with this limit shall render the requirements of 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements) and 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers) not applicable.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the daily VOC usage reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:
- (1) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.
 - (2) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the as supplied" and "as applied" VOC data sheets, for each month.
- (c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.
- (d) Compliance with the VOC emission limitations contained in Condition D.2.1 shall be demonstrated daily. This shall be based on the total volatile organic compound usage for the day, minus the amount VOC in the waste shipped out for recycling or disposal.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.3 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.2.1.
- (1) The VOC content of each solvent used.
 - (2) The amount of each solvent used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) If the amount of VOC in waste material is being deducted from the VOC usage as allowed in paragraph (b) of Condition D.2.2, then the following records shall be maintained:
 - (A) The amount of VOC containing waste shipped out to be recycled or disposed each day. The amount shipped out shall be recorded separately for each used solvent stream from each parts cleaner.
 - (B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.
 - (C) The weight of VOC usage, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.
 - (4) The total VOC usage for each day.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.2.4 Reporting Requirements

A quarterly summary of the information to document the compliance status with D.2.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

**Indiana Department of Environmental Management
Office of Air Quality
Compliance and Enforcement Branch**

Quarterly Report

Source Name: Royal Adhesives & Sealants, LLC
Source Address: 1915 N. Bendix Drive, South Bend, Indiana 46628
MSOP Permit No.: M141-43237-00615
Facility: The one (1) aerosol canister filling line (CFL1)
Parameter: VOC Emissions
Limit: The total VOC emissions from the one (1) aerosol canister filling line (CFL1) shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month.

The Permittee shall determine VOC emissions according to the formula contained in Condition D.1.4.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality
Compliance and Enforcement Branch**

Quarterly Report

Source Name: Royal Adhesives & Sealants, LLC
Source Address: 1915 N. Bendix Drive, South Bend, Indiana 46628
MSOP Permit No.: M141-43237-00615
Facility: The one (1) aerosol canister filling line (CFL2)
Parameter: VOC Emissions
Limit: The total VOC emissions from the one (1) aerosol canister filling line (CFL2) shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month.

The Permittee shall determine VOC emissions according to the formula contained in Condition D.1.4.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

MSOP Usage Report
(Submit Report Quarterly)

Source Name: Royal Adhesives & Sealants, LLC
Source Address: 1915 N. Bendix Drive, South Bend, Indiana 46628
MSOP Permit No.: M141-43237-00615
Facility: Two (2) cold parts cleaner (CPC1 and CPC2)
Parameter: VOC Emissions
Limit: The VOC emissions from the cold parts cleaner (CPC1 and CPC2) shall be less than fifteen (15) pounds per day of VOC.

Month: _____ Year: _____

Day	VOC Input (pounds)	Day	VOC Input (pounds)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Royal Adhesives & Sealants, LLC
Source Address:	1915 N. Bendix Drive
City:	South Bend, Indiana 46628
Phone #:	(574) 246-5381
MSOP #:	M141-43237-00615

I hereby certify that Royal Adhesives & Sealants, LLC is:

still in operation.

no longer in operation.

I hereby certify that Royal Adhesives & Sealants, LLC is:

in compliance with the requirements of MSOP M141-43237-00615.

not in compliance with the requirements of MSOP M141-43237-00615.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

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

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

Mail to: Permit Administration and Support Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Royal Adhesives & Sealants, LLC
1915 N. Bendix Drive
South Bend, Indiana 46628

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 Royal Adhesives & Sealants, LLC, 1915 N. Bendix Drive, South Bend, Indiana 46628, completed construction of the general warehousing and storage and adhesives and aerosol packaging operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 4, 2020 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M141-43237-00615, Plant ID No. 141-00615 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

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 _____, 20____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

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

**Technical Support Document (TSD) for a New Source Construction and
Minor Source Operating Permit (MSOP)**

Source Description and Location

Source Name: Royal Adhesives & Sealants, LLC
Source Location: 1915 N. Bendix Drive, South Bend, IN 46628
County: St. Joseph
SIC Code: 4225 (General Warehousing and Storage)
2891 (Adhesives and Sealants)
Operation Permit No.: M 141-43237-00615
Permit Reviewer: Michaela Hecox

On September 4, 2020, the Office of Air Quality (OAQ) received an application from Royal Adhesives & Sealants, LLC related to the construction and operation of a new stationary general warehousing and storage adhesives and sealants and aerosol packaging operation.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
St. Joseph County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
St. Joseph County has been classified as attainment or unclassifiable in Indiana for all the other

criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Royal Adhesives & Sealants, LLC on September 4, 2020, relating to the construction and operation of a new stationary aerosol adhesives packaging operation.

The following is a list of the new emission units:

- (a) Two (2) aerosol canister filling lines, identified as CFL1 and CFL2, approved in 2020 for construction, each with a maximum capacity of 150 canisters per hour, uncontrolled, and exhausting to stack S-01.
- (b) One (1) manual aerosol canister filling line, identified as MFL1, approved in 2020 for construction, with a maximum capacity of 2 canisters per hour, uncontrolled, and exhausting to stack S-01.
- (c) One (1) aerosol can filling line, identified as CFL3, approved in 2020 for construction, with a maximum capacity of 900 cans per hour, uncontrolled, and exhausting to stack S-02.
- (d) Two (2) cold parts cleaner, identified as CPC1 and CPC2, approved in 2020 for construction, each with a maximum capacity of 55 gallons of cleaning solvent, uncontrolled, and exhausting indoors.
- (e) Bulk pressure vessels containing various propellants used in the filling operations that consists of the following:

- (1) One (1) bulk pressure vessel containing Dimethyl Ether, identified as PT1, approved in 2020 for construction, uncontrolled, and with no exhaust.
- (2) One (1) bulk pressure vessel containing R134A, identified as PT2, approved in 2020 for construction, uncontrolled, and with no exhaust.
- (3) One (1) bulk pressure vessel containing Duracool 12a Refrigerant, identified as PT3, approved in 2020 for construction, uncontrolled, and with no exhaust.
- (4) One (1) bulk pressure vessel containing carbon dioxide (CO₂), identified as PT4, approved in 2020 for construction, uncontrolled, and with no exhaust.
- (5) One (1) bulk pressure vessel containing nitrogen (N), identified as PT5, approved in 2020 for construction, uncontrolled, and with no exhaust.

Note: There are no associated emissions with the bulk pressure vessels as they have been designed to operate without emission even during the loading process.

- (f) One (1) small aerosol can testing station for Quality Assurance/Quality Control, identified as QA/QC, approved in 2020 for construction, with a maximum capacity of 9,855 cans tested per year, uncontrolled, and exhausting outdoors.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – MSOP
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This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Unrestricted Source-Wide Emissions (ton/year)							
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Total HAPs
Total PTE of Entire Source Excluding Fugitives*	0.00	0.00	0.00	0.00	0.00	79.95	0.00	8.96
Title V Major Source Thresholds	--	100	100	100	100	100	100	25
Title V Major Source Thresholds	--	100	100	100	50	50	100	25
Total PTE of Entire Source Including Source-Wide Fugitives*	0.00	0.00	0.00	0.00	0.00	79.95	0.00	8.96
MSOP Thresholds	25	25	25	25	25	25	100	25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM_{2.5} listed is direct PM_{2.5}.

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

Federal Rule Applicability Determination

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, 40 CFR 60, Subpart VVa and 326 IAC 12, are not included in the permit for this source since it is not considered a synthetic organic chemicals manufacturing industry as defined in 40 CFR 60.481a.
- (b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T, are not included in the permit for this source since the cold parts cleaners do not contain halogenated HAPs.
- (b) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination - MSOP section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source (located in St. Joseph County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide unlimited PTE of PM is less than 10 tons per year; therefore, the source-wide actual emissions of PM are less than 10 tons per year. This source is not subject to the requirements of 326 IAC 6.5 because the source-wide PTE of PM is less than 100 tons per year and source-wide actual emissions of PM are less than 10 tons per year.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in St. Joseph County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)

Pursuant to 326 IAC 6.8-10-1, this source (located in St. Joseph County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State rule applicability for this source has been reviewed as follows:

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

- (a) The two (2) aerosol canister filling lines (CFL1 and CFL2) were constructed after January 1, 1980, and their unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year, each, and the units are not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the two (2) aerosol canister filling lines (CFL1 and CFL2) to less than twenty-five (25) tons per twelve (12) consecutive month period, each, in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the two (2) aerosol canister filling lines (CFL1 and CFL2) are not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (1) The total VOC emissions from the one (1) aerosol canister filling line (CFL1) shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month.
- (2) The total VOC emissions from the one (1) aerosol canister filling line (CFL2) shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from each of the two (2) aerosol canister filling lines (CFL1 and CFL2), and shall render the requirements of 326 IAC 8-1-6 not applicable to the two (2) aerosol canister filling lines (CFL1 and CFL2).

- (b) Pursuant to 326 IAC 8-1-6(1), the manual aerosol canister filling line (MFL1), the aerosol can filling line (CFL3), and the aerosol can QA/QC testing booth are not subject to the requirements of 326 IAC 8-1-6, because the unlimited VOC potential emissions of these units is less than 25 tons per year.

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

Pursuant to 326 IAC 8-1-1(b), the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-8 are not applicable to the cold parts cleaners (CPC1 & CPC2) since the source has agreed to limit the actual emissions of the cold parts cleaners (CPC1 & CPC2) to a level below fifteen (15) pounds per day of VOC, before add-on controls. The amount of VOC in waste shipped offsite may be deducted from the reported daily VOC usage.

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

Pursuant to 326 IAC 8-9-1(a), the bulk pressure vessels are not subject to the requirements of 326 IAC 8-9, because the source is not located in Clark, Floyd, Lake, or Porter County.

326 IAC 8-22 (Miscellaneous Industrial Adhesives)

Pursuant to 326 IAC 8-22-1(a), the source is not subject to the requirements of 326 IAC 8-22, because the source is not located in Lake or Porter County.

Compliance Determination and Monitoring Requirements

- (a) The Compliance Determination Requirements applicable to this source are as follows:

Aerosol canister filling lines (CFL1 and CFL2)

In order to demonstrate compliance with the 326 IAC 8-1-6 avoidance limits, the Permittee shall determine monthly VOC emissions from the two (2) aerosol canister filling lines (CFL1 and CFL2) according to the following formula:

To determine VOC emissions for the two (2) aerosol canister filling lines (CFL1 and CFL2), using the following formula:

$$E = [(Q_{adh} \times Q_{gal}) + (Q_{prop} \times Q_{can})] / 2000$$

Where:

- E = VOC emissions (tons/month)
Q_{adh} = Total pounds of VOC per gallon filled (pounds VOC/gallon)
Q_{gal} = Total gallons filled per month (gallons/month)
Q_{prop} = Total pounds of VOC per canister filled (pounds VOC/canister)
Q_{can} = Total canisters filled per month (canisters/month)

Cold Parts Cleaners (CPC1 & CPC2)

- (1) Compliance with the 326 IAC 8-3-2 avoidance limits shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (2) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the daily VOC usage reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:
 - (i) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.
 - (ii) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.
- (3) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.
- (4) Compliance with the VOC emission limitations shall be demonstrated daily. This shall be based on the total volatile organic compound usage for the day, minus the amount VOC in the waste shipped out for recycling or disposal.

Testing Requirements:

There are no compliance testing requirements applicable to the two (2) aerosol canister filling lines (CFL1 and CFL2). The source will demonstrate compliance with the VOC limits by keeping monthly records of their VOC emissions from the two (2) aerosol canister filling lines (CFL1 and CFL2).

- (b) The Compliance Monitoring Requirements applicable to this source are as follows:

There are no compliance monitoring requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 4, 2020.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 141-43237-00615. The staff recommends to the Commissioner that the New Source Construction and MSOP be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Michaela Hecox, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-3031 or (800) 451-6027, and ask for Michaela Hecox or (317) 233-3031.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations
PTE Summary

Company Name: Royal Adhesives & Sealants, LLC
Source Address: 1915 N. Bendix Drive, South Bend, IN 46628
Permit No.: M141-43237-00615
Reviewer: Michaela Hecox
Date: 9/16/2020

Uncontrolled Potential to Emit (tons/yr)								
Emissions Unit	PM	PM10	PM2.5*	SO ₂	NOx	VOC	CO	Total HAPs**
Aerosol Canister Filling Line #1 (CFL1)	-	-	-	-	-	29.71	-	3.31
Aerosol Canister Filling Line #2 (CFL2)	-	-	-	-	-	29.71	-	3.31
Manual Canister Filling Line #1 (MFL1)	-	-	-	-	-	8.58	-	0.35
Aerosol Can Filling Line #2 (CFL3)	-	-	-	-	-	6.63	-	0.80
Cold Parts Cleaners (CPC1 and CPC2)	-	-	-	-	-	1.18	-	1.18
Aerosol Can QA/QC Test Booth	-	-	-	-	-	4.12	-	0.00
Total PTE	0.00	0.00	0.00	0.00	0.00	79.95	0.00	8.96

*PM2.5 listed is direct PM2.5

** Fugitive HAP emissions are always included in the source-wide emissions

Potential to Emit after Issuance (tons/yr)								
Emissions Unit	PM	PM10	PM2.5*	SO ₂	NOx	VOC	CO	Total HAPs**
Aerosol Canister Filling Line #1 (CFL1)	-	-	-	-	-	29.71	-	3.31
Aerosol Canister Filling Line #2 (CFL2)	-	-	-	-	-	29.71	-	3.31
Manual Canister Filling Line #1 (MFL1)	-	-	-	-	-	8.58	-	0.35
Aerosol Can Filling Line #2 (CFL3)	-	-	-	-	-	6.63	-	0.80
Cold Parts Cleaners (CPC1 and CPC2)	-	-	-	-	-	1.18	-	1.18
Aerosol Can QA/QC Test Booth	-	-	-	-	-	4.12	-	0.00
Total PTE	0.00	0.00	0.00	0.00	0.00	79.95	0.00	8.96

*PM2.5 listed is direct PM2.5

** Fugitive HAP emissions are always included in the source-wide emissions

**Appendix A: Emissions Calculations
Filling Lines**

Company Name: Royal Adhesives & Sealants, LLC
Source Address: 1915 N. Bendix Drive, South Bend, IN 46628
Permit No.: M141-43237-00615
Reviewer: Michaela Hecox
Date: 9/16/2020

Potential Emissions from 6-Station Canister Filling Lines #1 (CFL1) and #2 (CFL2)

Maximum Annual Throughput (each line): 1,314,000 canisters/yr
 Adhesive Filling Emission Factor: 0.005 lb of VOC/gallon filled
 Propellant Emission Factor*: 0.02 lb of VOC/canister filled
 Theoretical VOC Content: 100 for each canister
 Theoretical Fillable Volume: 36 pounds/canister

Potential Emissions from Manual Canister Filling Line #1 (MFL1)

Maximum Annual Throughput (each line): 17,520 canisters/yr
 Adhesive Filling Emission Factor: 0.005 lb of VOC/gallon filled
 Propellant Emission Factor*: 0.78 lb of VOC/canister filled
 Theoretical VOC Content: 100 for each canister
 Theoretical Fillable Volume: 290.5 pounds/canister

Potential Emissions from Aerosol Can Filling Line #1 (CFL3)

Maximum Annual Throughput: 7,884,000 cans/yr
 Adhesive Filling Emission Factor: 0.005 lb of VOC/gallon filled
 Propellant Emission Factor: 0.001175 lb of VOC/can filled
 Theoretical VOC Content: 100 for each can
 Theoretical Fillable Volume: 0.836 pounds/can

Uncontrolled PTE Emissions

Line	Throughput (containers/year)	VOC Content (%)	Size of Container (gallons)	Gallons of VOC filled/year	VOC Emissions Filling (tpy)	VOC Emissions Propellant (tpy)	Total VOC Emissions (tpy)	HAP Emissions Filling* (tpy)	HAP Emissions Propellant (tpy)	Total HAP Emissions (tpy)
6-Station Canister Filling Line #1	1,314,000	100	5.0	6,629,055	16.57	13.14	29.71	3.31	0.00	3.31
6-Station Canister Filling Line #2	1,314,000	100	5.0	6,629,055	16.57	13.14	29.71	3.31	0.00	3.31
Manual Canister Filling Line #1	17,520	100	40.0	700,800	1.75	6.83	8.58	0.35	0.00	0.35
Aerosol Can Filling Line #1	7,884,000	100	0.1015625	800,719	2.00	4.63	6.63	0.80	0.00	0.80
Totals					36.90	37.74	74.64	7.78	0.00	7.78

Methodology and Notes

Adhesive Filling Emission Factor and Propellant Emission Factor-Can taken from April 1994 Accra Pac, Inc. Construction Permit 039-3350 (developed by the Source from stack testing during manufacturing)

Propellant Emission Factor-Automatic Canister Line = $[(0.001175 \text{ lbs. VOC / can filled}) \times (5 \text{ lbs. propellant per canister} / 0.293 \text{ lbs. propellant per can})] = 0.02 \text{ lbs. VOC / canister filled}$

Propellant Emission Factor-Manual Canister Line = $[(0.001175 \text{ lbs. VOC / can filled}) \times (130.5 \text{ lbs. propellant per canister} / 0.293 \text{ lbs. propellant per can})] = 0.78 \text{ lbs. VOC / canister filled}$

VOC Emissions - Filling - cans and canisters = $[(\text{gallons of adhesives filled}) \times (0.005 \text{ lbs. VOC/gallon of adhesive filled})]$

VOC Emissions - Propellant - cans = $[(\text{number of cans filled}) \times (0.001175 \text{ lbs. VOC/can filled})]$

VOC Emissions - Propellant - canisters = $[(\text{number of canisters filled}) \times (0.02 \text{ lbs. VOC/canister filled})]$

These calculations are based on a worst-case theoretical container size containing 100% VOC

There is no adhesive compounding operations at this facility

* = Assumes worst-case adhesive formula containing 20% HAPs for canisters and a worst-case adhesive formula containing 40% HAPs for cans

**Appendix A: Emissions Calculations
Cold Parts Cleaners (CPC1 and CPC2)**

Company Name: Royal Adhesives & Sealants, LLC
Source Address: 1915 N. Bendix Drive, South Bend, IN 46628
Permit No.: M141-43237-00615
Reviewer: Michaela Hecox
Date: 9/16/2020

The source uses toluene as a cleaner.
 The solvent has a maximum density of 7.2 lb/gal.
 The solvent used in the degreaser contains 100% VOC and up to 100% HAP (toluene)

Uncontrolled Potential Emissions (per each degreaser)

7.1767	lb/gal x	100	% VOC x	165	gal/yr ÷	2000	lb/ton =	0.59	tons VOC per year	each
				0.59	tpy VOC x	100	% HAP =	0.59	tons HAP per year	each
2 parts washers								=	1.18 tons VOC per year	combined
								=	1.18 tons HAP per year (toluene)	combined

Solvent	Specific Gravity	Density of water	Density of Toluene
Toluene	0.86	8.345 lb/gal	7.1767 lb/gal

Note: Cold Parts Cleaner will operate with only 1 solvent, either Hexane or Toluene.

Appendix A: Emissions Calculations

Company Name: Royal Adhesives & Sealants, LLC
Source Address: 1915 N. Bendix Drive, South Bend, IN 46628
Permit No.: M141-43237-00615
Reviewer: Michaela Hecox
Date: 9/16/2020

Cans	Formulas	Propellant (lbs.)	Propellant (lbs./gal.)	Propellant (gals.)	Adhesive (lbs.)	Adhesive (lbs./gal.)	Adhesive (gals.)	Total Gallons per Can	Total Pounds per Can	Percent HAPs	HAP
	12653-12137	0.331	7.172	0.046	0.500	6.52	0.08	0.123	0.831	0	
	12886-13247	0.309	7.172	0.043	0.463	6.97	0.07	0.110	0.772	< 20	Hexane
	12934-12888	0.293	7.172	0.041	0.543	6.60	0.08	0.123	0.836	27.2	Hexane
	New - 12888	0.293	7.172	0.041	0.543	6.60	0.08	0.123	0.836	27.2	Hexane

Canisters	Formulas	Propellant (lbs.)	Propellant (lbs./gal.)	Propellant (gals.)	Adhesive (lbs.)	Adhesive (lbs./gal.)	Adhesive (gals.)	Total Gallons per Canister	Total Pounds per Canister	Percent HAPs	Propellant Emission Factor Ratio
	15268	5	7.172	0.697	31	7.13498	4.34	5.042	36.0	0	17.06
	13228	5	7.172	0.697	31	7.13	4.35	5.045	36.0	0	17.06
	13228	130.5	7.172	18.195	160	7.13	22.44	40.635	290.5	0	445.39

**Appendix A: Emission Calculations
Filling Lines**

Company Name: Royal Adhesives & Sealants, LLC
Source Address: 1915 N. Bendix Drive, South Bend, IN 46628
Permit No.: M141-43237-00615
Reviewer: Michaela Hecox
Date: 9/16/2020

Potential Emissions from Aerosol Can QA/QC Test Booth

Maximum Annual Throughput: 9,855 cans/yr
 Theoretical VOC Content: 100 for each can
 Theoretical Fillable Volume: 0.836 pounds/can

Uncontrolled PTE Emissions

Line	Throughput (cans/year)	VOC Content (%)	Size of Container (gallons)	Gallons of VOC expelled/year	Pounds of VOC expelled/year	Total VOC Emissions (tpy)	Total HAP Emissions (tpy)
Aerosol Can QA/QC Test Booth	9,855	100	0.123	1,212	8238.78	4.12	0.00
Totals					8,238.78	4.12	0.00



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

October 9, 2020

Troy Amones
Royal Adhesives & Sealants, LLC
2001 W Washington St
South Bend, IN 46628

Re: Public Notice
Royal Adhesives & Sealants, LLC
Permit Level: MSOP New Srce Const Minor PSD
Permit Number: 141-43237-00615

Dear Mr. Amones:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at:**

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 43237

and

IDEM's Virtual File Cabinet (VFC): <http://www.IN.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: <https://www.in.gov/idem/5474.htm>

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the St. Joseph County Public Library, 304 South Main Street in South Bend, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Michaela Hecox, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-3031 or dial (317) 233-3031.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

October 9, 2020

To: St. Joseph County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Royal Adhesives & Sealants, LLC
Permit Number: 141-43237-00615

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

October 9, 2020
Royal Adhesives & Sealants, LLC
141-43237-00615

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at <https://www.in.gov/idem/5474.htm>.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020

Mail Code 61-53

IDEM Staff	TAWEAVER October 9, 2020 Royal Adhesives & Sealants LLC 141-43237-00615 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Troy Amones Royal Adhesives & Sealants LLC 2001 W Washington St South Bend IN 46628 (Source CAATS)										
2		Dan Beringer Operations Manager Royal Adhesives & Sealants LLC 2001 W Washington St South Bend IN 46628 (RO CAATS)										
3		Mishawaka City Council and Mayors Office 600 E. 3rd Street Mishawaka City Hall Mishawaka IN 46546 (Local Official)										
4		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
5		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
6		Mark Espich St. Joseph County Health Department 227 W Jefferson Blvd South Bend IN 46601 (Health Department)										
7		St. Joseph County Public Library 304 S Main St South Bend IN 46601 (Library)										
8		Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 (Affected Party)										
9		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)										
10		Mr. Ray Hahn Civil & Environmental Consultants, Inc. 4841 Monroe Street, Suite 103 Toldedo OH 43623 (Consultant)										
11												
12												
13												
14												
15												

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