NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Modification to a Part 70 Operating Permit for Avery Dennison MFD in Lake County

Significant Permit Modification No.: 089-42985-00407

The Indiana Department of Environmental Management (IDEM) has received an application from Avery Dennison MFD, located at 270 Westmeadow Place, Lowell, IN 46356, for a significant modification of its Part 70 Operating Permit issued on October 19, 2018. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Avery Dennison MFD to make certain changes at its existing source. Avery Dennison MFD has applied to limit the total and single HAP emissions in order to become an area source of HAPs.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Lowell Public Library
1505 East Commercial Ave.
Lowell, IN 46356

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

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 SPM 089-42985-00407 in all correspondence.

Comments should be sent to:

Olajumoke Kayode  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Olajumoke Kayode or (317) 234-5373  
Or dial directly: (317) 234-5373  
Fax: (317) 232-6749 attn: Olajumoke Kayode  
E-mail: okayode@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, the IDEM Regional Office indicated above, 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 Olajumoke Kayode of my staff at the above address.

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

[Signature]

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality
Ms. Kate Thomas  
Avery Dennison MFD  
270 Westmeadow Place, 
Lowell, IN 46356  

Re: 089-42985-00407  
Significant Permit Modification  

Dear Ms. Thomas:  

Avery Dennison MFD was issued Part 70 Operating Permit Renewal No. T089-39324-00407 on October 19, 2018 for a stationary vinyl coating operation located at 270 Westmeadow Place, Lowell, IN 46356. An application requesting changes to this permit was received on June 19, 2020. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.  

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:  

Attachment A: 40 CFR 60, Subpart RR, New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations has been removed  

Attachment B: 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating has been removed  

Attachment C: 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines  

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.  

Previously issued approvals for this source are 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.  


A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the application and permit 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. 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.  

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
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If you have any questions regarding this matter, please contact Olajumoke Kayode, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5373 or (800) 451-6027, and ask for Olajumoke Kayode or (317) 234-5373.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - Lake County
    Lake County Health Department
    U.S. EPA, Region 5
    Compliance and Enforcement Branch
    IDEM Northwest Regional Office
Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Avery Dennison MFD
270 Westmeadow Place
Lowell, Indiana 46356

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

| Operation Permit No.: T089-39324-00407 |
| Master Agency Interest ID No.: 13684 |
| Original Issued/Signed by: Iryn Calilung, Section Chief Permits Branch, Office of Air Quality | Issuance Date: October 19, 2018 |
| | Expiration Date: October 19, 2023 |

Administrative Amendment No.: 089-41364-00407, issued on June 6, 2019.

| Significant Permit Modification No.: 089-42985-00407 |
| Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality | Issuance Date: |
| | Expiration Date: October 19, 2023 |
# DRAFT

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Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines
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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary vinyl coating operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>270 Westmeadow Place, Lowell, Indiana 46356</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>219-690-4015</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2671 (Packaging Paper and Plastics Film, Coated and Laminated)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Lake</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Nonattainment for 8-hour ozone standard</td>
</tr>
<tr>
<td></td>
<td>Attainment for all other criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Part 70 Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Major Source Emission Offset Rules</td>
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<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) vinyl casting/roll coating line, identified as L-1, constructed on July 1, 1980, approved in 2020 to remove the use of adhesive coatings, with a maximum capacity of 25,313 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 4.0 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

(b) One (1) vinyl casting/roll coating line, identified as L-2, constructed on December 1, 1984 and modified in 2001 to add one (1) surface coating head, identified as CH-1, approved in 2020 to remove the use of adhesive coatings, with a total maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

(c) One (1) vinyl casting/roll coating line, identified as L-3, constructed on June 1, 1988, approved in 2020 to remove the use of adhesive coatings, with a maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

Thermal oxidizer (C-1) is a common control for L-1, L-2, and L-3. C-1 is not used when emulsion coating is used.

(d) One (1) natural gas-fired thermal oxidizer, identified as C-1, constructed in 2011, with a total heat input capacity of 28.46 million Btu per hour, controlling VOC and HAP emissions from L-1, L-2, and L-3, except when using an emulsion coating in L-1, L-2 and L-3, exhausting to stack S-1, and consisting of the following:
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

(a) Two (2) emergency generators:

(1) One (1) natural gas-fired emergency generator, installed in 2005, with a maximum output horsepower rating (hp) of 25 HP, using no control, and exhausting to the atmosphere;

(2) One (1) diesel-fired emergency generator, installed on February 2, 2005, with a maximum output horsepower rating (hp) of 500 HP, using no control, and exhausting to the atmosphere.

Under 40 CFR Part 63, Subpart ZZZZ (4Z), these emergency generators are considered affected units.

(b) Thirty-three (33) natural gas-fired combustion sources:

<table>
<thead>
<tr>
<th>Emission unit ID</th>
<th>Heating type</th>
<th>Construction Date</th>
<th>Direct/Indirect</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
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</thead>
<tbody>
<tr>
<td>HVAC1B</td>
<td>General Room Heating</td>
<td>1993</td>
<td>Direct</td>
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<tr>
<td>HVAC3B</td>
<td>General Room Heating</td>
<td>1993</td>
<td>Direct</td>
<td>1.296</td>
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<tr>
<td>HVAC4B</td>
<td>General Room Heating</td>
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<td>Direct</td>
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<td>General Room Heating</td>
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<td>Indirect</td>
<td>0.15</td>
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<td>Indirect</td>
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<td>HVAC7</td>
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<td>Indirect</td>
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<td>Indirect</td>
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<td>Indirect</td>
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<td>General Room Heating</td>
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<td>Indirect</td>
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<td>General Room Heating</td>
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<td>Indirect</td>
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<td>General Room Heating</td>
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<td>Indirect</td>
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<td>HVAC20</td>
<td>General Room Heating</td>
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<td>Indirect</td>
<td>0.4</td>
</tr>
<tr>
<td>HVAC21</td>
<td>General Room Heating</td>
<td>2004</td>
<td>Indirect</td>
<td>0.24</td>
</tr>
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<td>HVAC22</td>
<td>General Room Heating</td>
<td>2010</td>
<td>Indirect</td>
<td>0.065</td>
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<tr>
<td>HVAC23</td>
<td>General Room Heating</td>
<td>2010</td>
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</tr>
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<td>Indirect</td>
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<td>HVAC33</td>
<td>General Room Heating</td>
<td>2003</td>
<td>Indirect</td>
<td>0.47</td>
</tr>
</tbody>
</table>
(c) One (1) cold cleaner degreaser with a remote solvent reservoir, constructed in 1990, with a maximum capacity of 145 gallons per year.

(d) Three (3) VOC and HAP storage tanks as follows:

(1) One (1) vertical fixed roof tank, identified as L1 Wash, with a maximum capacity of 105 gallons and annual throughput of 2,080 gallons per year of VOC containing material.

(2) One (1) vertical fixed roof tank, identified as L2 Wash, with a maximum capacity of 61 gallons and annual throughput of 2,080 gallons per year of VOC containing material.

(3) One (1) vertical fixed roof tank, identified as L3 Wash, with a maximum capacity of 105 gallons and annual throughput of 2,080 gallons per year of VOC containing material.

(2) This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) One (1) dry material dump station, identified as Base Compounding, with a maximum capacity of 213.35 pounds of material per hour, controlled by a 1,600 cfm dust collector, and exhausting indoors;

(b) Eight (8) small product mixers, uncontrolled, exhausting to the atmosphere, consisting of:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process</th>
<th>Construction Date</th>
<th>Maximum throughputs (tons/yr)</th>
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<tr>
<td>Mixer 1</td>
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<td>Churn Wash</td>
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</tr>
<tr>
<td>Mixer 8</td>
<td>Base Compounding</td>
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<td></td>
</tr>
</tbody>
</table>
(c) One (1) Drum washer, constructed in 1995, with a maximum throughput of 79.45 tons of solvent per year, equipped with a spray nozzle to clean out residue from the mixing drums, draining into a closed loop solvent recovery system, and exhausting to the atmosphere.

(d) One (1) Churn washer, constructed in 1995, with a maximum throughput of 155.43 tons of solvent per year, equipped with a spray nozzle to clean out residue from the churns, draining into a closed loop solvent recovery system, and exhausting to the atmosphere.

(e) One (1) Solvent recycling system, constructed in 1995, with a combined total maximum batch capacity of 72 gallons, consisting of:

(1) One (1) still solvent tank, with a maximum throughput of 296.68 tons of waste solvent per year.

(2) One (1) solvent distillation process, used to separate out the waste material, with a maximum throughput of 387.96 tons of solvent per year, emission points at a condenser vent, with some released as fugitive.

(3) One (1) distillation solvent tank, containing clean solvent ready for reuse, with a maximum throughput of 387.96 tons of solvent per year.

(f) Paved roads and parking lots with public access;

(g) Closed loop heating and cooling systems;

(h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;

(i) Blowdown for any of the following: sight glass, boiler; compressors, pumps, and cooling tower;

(j) On-site fire and emergency response training approved by the department;

(k) A laboratory as defined in 326 IAC 2-7-1(21)(D).

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B
GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T089-39324-00407, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 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.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]
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.5 Severability [326 IAC 2-7-5(5)]
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(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.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
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(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal 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).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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 PMP extension notification does not 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).

The Permittee shall implement the PMPs.

(c) 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. The PMPs and their submittal do not 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).

(d) 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.11 Emergency Provisions [326 IAC 2-7-16]

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

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

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

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

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

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

   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

5. For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

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

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

   (A) A description of the emergency;
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(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require 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).

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

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

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

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

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable
requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T089-39324-00407 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification 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).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application 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).

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 nine (9) months 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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application 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).

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

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

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(3) Any change in emissions; and

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not 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).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating
scenarios that are described in the terms and conditions of this permit in accordance with
326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
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 Part 70 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 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
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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
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Any such application 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).

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

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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

Emission Limitations and Standards  [326 IAC 2-7-5(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 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 twenty percent (20%) 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.3 Open Burning  [326 IAC 4-1][IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

C.6 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:
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(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

   (A) Asbestos removal or demolition start date;

   (B) Removal or demolition contractor; or

   (C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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. The notifications do not 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).

(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 2-7-6(1)]

C.7 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:
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not 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).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not 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).

(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.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for 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

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

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(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 [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

(l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:
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.

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.

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.

Failure to take reasonable response steps shall be considered a deviation from the permit.

The Permittee shall record the reasonable response steps taken.

CAM Response to excursions or exceedances.

1. Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

2. 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, monitoring results, review of operation and maintenance procedures and records, and
inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
   The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

   (1) Failed to address the cause of the control device performance problems; or

   (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) CAM recordkeeping requirements.
   (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the
Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do 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).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:

(1) starting in 2004 and every three (3) years thereafter, and

(2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

(b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
The emission statement 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).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(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. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include 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). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.
A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(b) The address for report submittal is:

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) 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.

(d) 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.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) vinyl casting/roll coating line, identified as L-1, constructed on July 1, 1980, approved in 2020 to remove the use of adhesive coatings, with a maximum capacity of 25,313 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 4.0 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

(b) One (1) vinyl casting/roll coating line, identified as L-2, constructed on December 1, 1984 and modified in 2001 to add one (1) surface coating head, identified as CH-1, approved in 2020 to remove the use of adhesive coatings, with a total maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

(c) One (1) vinyl casting/roll coating line, identified as L-3, constructed on June 1, 1988, approved in 2020 to remove the use of adhesive coatings, with a maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

Thermal oxidizer (C-1) is a common control for L-1, L-2, and L-3. C-1 is not used when emulsion coating is used.

(d) One (1) natural gas-fired thermal oxidizer, identified as C-1, constructed in 2011, with a total heat input capacity of 28.46 million Btu per hour, controlling VOC and HAP emissions from L-1, L-2, and L-3, except when using an emulsion coating in L-1, L-2 and L-3, exhausting to stack S-1, and consisting of the following:

   (1) Two (2) burners each rated at 3.2 million Btu per hour;

   (2) Two (2) injectors each rated at 2.5 million Btu per hour; and

   (3) One (1) hot oil burner rated at 17.06 million Btu per hour.

(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 2-7-5(1)]

D.1.1  Volatile Organic Compounds (VOC) [326 IAC 2-7]

Pursuant to 326 IAC 2-7-10.5(d)(9) (Repealed), MSM 089-12713-00407, issued on December 14, 2000, as revised by Part 70 renewal permit T089-39324-00407, issued on October 19, 2018 and as revised in SPM 089-42985-00407:

(a) The VOC input to surface coating head CH-1, part of L-2, shall not exceed 494.89 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Thermal oxidizer C-1 shall control VOC emissions from CH-1 and achieve a minimum overall efficiency of ninety-six percent (96%).
D.1.2 Emission Offset Minor Limit VOC [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 not applicable, the Permittee shall comply with the following:

The combined VOC emissions, after control, of the following emission units:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

shall not exceed 82.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11(b)(1)(B) and 326 IAC 8-2-11(b)(2), the Permittee shall comply with either of the following:

(a) Limit the VOC content of coating to 4.8 pounds per gallon, excluding water, delivered to the coating applicator from a vinyl coating line; or

(b) Install add on capture and control devices with an overall control efficiency of not less than 67.5 percent (67.5%) which shall meet:

(1) Capture efficiency of at least 75%; and

(2) Control efficiency from the control devices of at least 90%. In the case of incineration, the system shall have a destruction efficiency of 90% which will reduce VOC to carbon dioxide and water.

D.1.4 Hazardous Air Pollutant (HAP) Minor Limits [326 IAC 20] [40 CFR 63]

In order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:

HAP emissions after control from the following lines:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

shall not exceed the emissions limits specified in the table below, with compliance determined at the end of each month:
Pollutants | Tons per twelve (12) consecutive month period
---|---
Total HAPs | 24.35
Single HAP | 9.90

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their 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 2-7-5(1)]**

D.1.6 Thermal Oxidizer Operation

(a) VOC

In order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3(b), the natural gas-fired thermal oxidizer C-1 for VOC and HAP control shall be in operation at all times the following are operating:

<table>
<thead>
<tr>
<th>Line ID</th>
<th>vinyl casting/roll coating line L-1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td></td>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

(b) HAP

In order to demonstrate compliance with Condition D.1.4, the natural gas-fired thermal oxidizer C-1 for HAP control shall be in operation at all times the following are operating:

<table>
<thead>
<tr>
<th>Line ID</th>
<th>vinyl casting/roll coating line L-1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td></td>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

(a) Compliance with the VOC limitations contained in Conditions D.1.1, D.1.2 and D.1.3 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) In order to demonstrate compliance with the VOC emission limitation in Condition D.1.1, the Permittee shall determine VOC emissions for each month, using the following methodology:

\[
\text{VOC Emissions CH-1} = \lfloor \text{VOC input} \times (1-\text{CE}) \rfloor
\]

Where:
DRAFT

VOC input = total VOC applied (coating and solvents) in CH-1
CE = Overall control efficiency of the thermal oxidizer (C-1) from the most recent stack test approved by IDEM

(c) In order to demonstrate compliance with the VOC emission limitation in Condition D.1.2, the Permittee shall determine VOC emissions for each month, using the following methodology:

VOC Emissions (total) = VOC Emissions (L-1) + VOC Emissions (L-2) + VOC Emissions (L-3)

VOC Emissions (per coating line) = [VOC input x (1-CE)]

Where:

VOC input = total VOC applied (coating and solvents) in each of the roll coating lines
CE = Overall control efficiency of the thermal oxidizer (C-1) from the most recent stack test approved by IDEM

D.1.8 Hazardous Air Pollutants (HAP)

(a) Compliance with the single and combined HAP limits in Condition D.1.4 shall be determined by obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 311- Analysis of Hazardous Air Pollutants Compound in Paints and Coatings, or other test methods as approved by the commissioner.

(b) HAP emissions after control from the following lines:

- vinyl casting/roll coating line L-1
- vinyl casting/roll coating line L-2
- vinyl casting/roll coating line L-3

shall be determined using the following equations:

Equation 1:
Single HAP Emissions tons/month = Single HAP Input tons/month x (1 - CE)

Equation 2:
Total HAPs emissions tons/month = Sum of Single HAP Emissions

Where:

CE = Overall HAP control efficiency % of the thermal oxidizer C-1 from the most recent stack test approved by IDEM.

D.1.9 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1, D.1.2, D.1.3(b), and D.1.4, the Permittee shall conduct performance tests to determine the VOC and HAP capture and destruction efficiencies (overall efficiency) of thermal oxidizer C-1 at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.
**Compliance Monitoring Requirements**  
[326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

### D.1.10 Thermal Oxidizer Temperature [40 CFR Part 64]

| (a) | A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring the operating temperature. For purposes of this condition, continuous mean no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour averages. |
| (b) | The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, D.1.3(b), and D.1.4. |
| (c) | On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test when applying the VOC and HAP control demonstrated during the most recent testing event. |
| (d) | If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, and the Permittee desires the use of the most recent (and higher destruction) VOC and control demonstration data, the Permittee shall take a reasonable response to return the operating unit temperature to that demonstrated during the most recent compliance test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit. Temperature monitoring data that indicates lower than the most recent demonstrated testing but above the unit operating baseline (controls at or above 96%) will not be considered a CAM excursion. |

### D.1.11 Thermal Oxidizer Duct Pressure or Fan Amperage

| (a) | The Permittee shall determine the appropriate duct pressure or fan amperage for thermal oxidizer or other enclosure monitoring methods from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, D.1.3(b), and D.1.4. |
| (b) | The duct pressure, fan amperage, or other capture monitoring system shall be observed at least once per day when the VOC controls and thermal oxidizer system is in operation. On and after the date the stack test results are available, the duct pressure, fan amperage, or other capture monitoring parameters/methods shall be maintained within the normal range as established in the baseline monitoring or latest compliant stack test as appropriate. |
| (c) | When, for any one reading, the duct pressure, fan amperage, or other enclosure operating parameter is outside the above mentioned range, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. |

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

### D.1.12 Record Keeping Requirements

| (a) | To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below for the following:
Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on monthly basis.

(A) Records shall include purchase orders, process consumption records, invoices, manufacturer’s formulation data, and/or safety data sheets (SDS) or other supplier provided information and material testing necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(b) To document the compliance status with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent used on monthly basis.

Records shall include purchase order, process consumption records, invoices, manufacturer’s formulation data and/or safety data sheets (SDS) necessary to verify the type and amount used.

(3) The total emissions of each single HAP from the following for each month and each compliance period:

<table>
<thead>
<tr>
<th>Line ID</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
<td></td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
<td></td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
<td></td>
</tr>
</tbody>
</table>

Records of emissions for each single HAP are only required when the total combined HAP emissions exceed 10 tons per year.

(4) The total emissions of any combination of HAPs from the following for each month and each compliance period:

<table>
<thead>
<tr>
<th>Line ID</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
<td></td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
<td></td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
<td></td>
</tr>
</tbody>
</table>
(c) To document the compliance status with Conditions D.1.1, D.1.2, D.1.4 and D.1.9, the Permittee shall maintain records of the test results.

(d) To document the compliance status with Condition D.1.11, the Permittee shall maintain daily records of the duct pressures or fan amperages for the thermal oxidizer C-1. The Permittee shall include in its daily record when a duct pressure or fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g. the process did not operate that day).

(e) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1(a), D.1.2 and D.1.4 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements 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).
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(c) One (1) cold cleaner degreaser with a remote solvent reservoir, constructed in 1990, with a maximum capacity of 145 gallons per year.

(d) Three (3) VOC and HAP storage tanks as follows:

(1) One (1) vertical fixed roof tank, identified as L1 Wash, with a maximum capacity of 105 gallons and annual throughput of 2,080 gallons per year of VOC containing material.

(2) One (1) vertical fixed roof tank, identified as L2 Wash, with a maximum capacity of 61 gallons and annual throughput of 2,080 gallons per year of VOC containing material.

(3) One (1) vertical fixed roof tank, identified as L3 Wash, with a maximum capacity of 105 gallons and annual throughput of 2,080 gallons per year of VOC containing material.

(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 2-7-5(1)]

D.2.1 Cold Cleaner Operations [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall comply with the following requirements for the cold cleaner degreaser:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in items (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8(a), the Permittee shall not operate the cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.3 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-6(a) and (b)]

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall:

(a) Keep all records required below for the life of each vessel.

(b) Maintain a record and submit to the department a report containing the following information for each vessel:
DRAFT

(1) The vessel identification number.

(2) The vessel dimensions.

(3) The vessel capacity.

(4) A description of the emission control equipment for each vessel described in section 4(a) and 4(b) of this rule, or a schedule for installation of emission control equipment on vessels described in section 4(a) or 4(b) of this rule with a certification that the emission control equipment meets the applicable standards.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations.

(1) The name and address of the solvent supplier.

(2) The date of purchase (or invoice/bill date of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(6) All records required by Condition D.2.5(a)(1) through (5) shall be:

(A) retained on-site or accessible electronically from the site for the most recent three (3) year period; and

(B) reasonably accessible for an additional two (2) year period.

(b) Section C - General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required to be maintained by this condition.
### Emissions Unit Description:

#### Insignificant Activities:

(b) Thirty-three (33) natural gas-fired combustion sources:

<table>
<thead>
<tr>
<th>Emission unit ID</th>
<th>Heating type</th>
<th>Construction Date</th>
<th>Direct/Indirect</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>HVAC1B</td>
<td>General Room Heating</td>
<td>1993</td>
<td>Direct</td>
<td>1.296</td>
</tr>
<tr>
<td>HVAC3B</td>
<td>General Room Heating</td>
<td>1993</td>
<td>Direct</td>
<td>1.296</td>
</tr>
<tr>
<td>HVAC4B</td>
<td>General Room Heating</td>
<td>1993</td>
<td>Direct</td>
<td>1.296</td>
</tr>
<tr>
<td>HVAC5</td>
<td>General Room Heating</td>
<td>2002</td>
<td>Indirect</td>
<td>0.15</td>
</tr>
<tr>
<td>HVAC6</td>
<td>General Room Heating</td>
<td>2003</td>
<td>Indirect</td>
<td>0.096</td>
</tr>
<tr>
<td>HVAC7</td>
<td>General Room Heating</td>
<td>2006</td>
<td>Indirect</td>
<td>0.39</td>
</tr>
<tr>
<td>HVAC8</td>
<td>General Room Heating</td>
<td>2005</td>
<td>Indirect</td>
<td>0.24</td>
</tr>
<tr>
<td>HVAC9</td>
<td>General Room Heating</td>
<td>1984</td>
<td>Indirect</td>
<td>0.285</td>
</tr>
<tr>
<td>HVAC10</td>
<td>General Room Heating</td>
<td>2009</td>
<td>Indirect</td>
<td>0.18</td>
</tr>
<tr>
<td>HVAC17</td>
<td>General Room Heating</td>
<td>2004</td>
<td>Indirect</td>
<td>0.154</td>
</tr>
<tr>
<td>HVAC18</td>
<td>General Room Heating</td>
<td>1983</td>
<td>Indirect</td>
<td>0.37</td>
</tr>
<tr>
<td>HVAC19</td>
<td>General Room Heating</td>
<td>2006</td>
<td>Indirect</td>
<td>0.48</td>
</tr>
<tr>
<td>HVAC20</td>
<td>General Room Heating</td>
<td>1988</td>
<td>Indirect</td>
<td>0.4</td>
</tr>
<tr>
<td>HVAC21</td>
<td>General Room Heating</td>
<td>2004</td>
<td>Indirect</td>
<td>0.24</td>
</tr>
<tr>
<td>HVAC22</td>
<td>General Room Heating</td>
<td>2010</td>
<td>Indirect</td>
<td>0.065</td>
</tr>
<tr>
<td>HVAC23</td>
<td>General Room Heating</td>
<td>2010</td>
<td>Indirect</td>
<td>0.065</td>
</tr>
<tr>
<td>HVAC24</td>
<td>General Room Heating</td>
<td>2010</td>
<td>Indirect</td>
<td>0.065</td>
</tr>
<tr>
<td>HVAC25</td>
<td>General Room Heating</td>
<td>2004</td>
<td>Indirect</td>
<td>0.12</td>
</tr>
<tr>
<td>HVAC26</td>
<td>General Room Heating</td>
<td>2006</td>
<td>Indirect</td>
<td>0.115</td>
</tr>
<tr>
<td>HVAC27</td>
<td>General Room Heating</td>
<td>2002</td>
<td>Indirect</td>
<td>0.115</td>
</tr>
<tr>
<td>HVAC28B</td>
<td>General Room Heating</td>
<td>1988</td>
<td>Indirect</td>
<td>0.075</td>
</tr>
<tr>
<td>HVAC30</td>
<td>General Room Heating</td>
<td>2005</td>
<td>Indirect</td>
<td>0.05</td>
</tr>
<tr>
<td>HVAC31</td>
<td>General Room Heating</td>
<td>2005</td>
<td>Indirect</td>
<td>0.48</td>
</tr>
<tr>
<td>HVAC32</td>
<td>General Room Heating</td>
<td>2000</td>
<td>Indirect</td>
<td>0.235</td>
</tr>
<tr>
<td>HVAC33</td>
<td>General Room Heating</td>
<td>2003</td>
<td>Indirect</td>
<td>0.47</td>
</tr>
<tr>
<td>HVAC34</td>
<td>General Room Heating</td>
<td>2003</td>
<td>Indirect</td>
<td>0.299</td>
</tr>
<tr>
<td>HVAC35</td>
<td>General Room Heating</td>
<td>1995</td>
<td>Direct</td>
<td>0.825</td>
</tr>
<tr>
<td>HVAC36A</td>
<td>General Room Heating</td>
<td>1994</td>
<td>Indirect</td>
<td>0.046</td>
</tr>
<tr>
<td>HVAC37B</td>
<td>General Room Heating</td>
<td>1994</td>
<td>Indirect</td>
<td>0.046</td>
</tr>
<tr>
<td>HVAC45</td>
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<td>2005</td>
<td>Indirect</td>
<td>0.399</td>
</tr>
<tr>
<td>HVAC47</td>
<td>General Room Heating</td>
<td>2003</td>
<td>Indirect</td>
<td>0.045</td>
</tr>
<tr>
<td>HVAC48</td>
<td>General Room Heating</td>
<td>2009</td>
<td>Indirect</td>
<td>0.15</td>
</tr>
<tr>
<td>HVAC49</td>
<td>General Room Heating</td>
<td>2019</td>
<td>Indirect</td>
<td>1.5</td>
</tr>
</tbody>
</table>

(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 2-7-5(1)]

**D.3.1 Particulate Emissions Limitations [326 IAC 6-2]**

Pursuant to 326 IAC 6-2-4(a) (Particulate Limitations for Sources of Indirect Heating) the PM emissions from the following combustion units shall not exceed 0.60 pounds per MMBtu heat input.

<table>
<thead>
<tr>
<th>Year Constructed</th>
<th>Emission Unit</th>
<th>Maximum Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1983</td>
<td>HVAC18</td>
<td>0.37</td>
</tr>
<tr>
<td>1984</td>
<td>HVAC9</td>
<td>0.285</td>
</tr>
<tr>
<td>1988</td>
<td>HVAC20</td>
<td>0.4</td>
</tr>
<tr>
<td></td>
<td>HVAC28B</td>
<td>0.075</td>
</tr>
<tr>
<td>1994</td>
<td>HVAC36A</td>
<td>0.046</td>
</tr>
<tr>
<td></td>
<td>HVAC37B</td>
<td>0.046</td>
</tr>
<tr>
<td>2000</td>
<td>HVAC32</td>
<td>0.235</td>
</tr>
<tr>
<td></td>
<td>HVAC5</td>
<td>0.15</td>
</tr>
<tr>
<td></td>
<td>HVAC27</td>
<td>0.115</td>
</tr>
<tr>
<td>2003</td>
<td>HVAC6</td>
<td>0.096</td>
</tr>
<tr>
<td></td>
<td>HVAC33</td>
<td>0.47</td>
</tr>
<tr>
<td></td>
<td>HVAC34</td>
<td>0.299</td>
</tr>
<tr>
<td></td>
<td>HVAC47</td>
<td>0.045</td>
</tr>
<tr>
<td>2004</td>
<td>HVAC17</td>
<td>0.154</td>
</tr>
<tr>
<td></td>
<td>HVAC21</td>
<td>0.24</td>
</tr>
<tr>
<td></td>
<td>HVAC25</td>
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<td>HVAC31</td>
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<tr>
<td></td>
<td>HVAC45</td>
<td>0.399</td>
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<tr>
<td>2006</td>
<td>HVAC7</td>
<td>0.39</td>
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<td></td>
<td>HVAC19</td>
<td>0.48</td>
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<td></td>
<td>HVAC26</td>
<td>0.115</td>
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<tr>
<td>2009</td>
<td>HVAC10</td>
<td>0.18</td>
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<td></td>
<td>HVAC48</td>
<td>0.15</td>
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<tr>
<td>2010</td>
<td>HVAC22</td>
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<tr>
<td></td>
<td>HVAC23</td>
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</tr>
<tr>
<td></td>
<td>HVAC24</td>
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</tr>
<tr>
<td>2019</td>
<td>HVAC49</td>
<td>1.5</td>
</tr>
</tbody>
</table>

**D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
SECTION E.1

RESERVED
SECTION E.2

DRAFT
RESERVED
SECTION E.3 NESHAP

Emissions Unit Description:

Insignificant Activities:

(a) Two (2) emergency generators:

(1) One (1) natural gas-fired emergency generator, installed in 2005, with a maximum output horsepower rating (hp) of 25 HP, using no control, and exhausting to the atmosphere;

(2) One (1) diesel-fired emergency generator, installed on February 2, 2005, with a maximum output horsepower rating (hp) of 500 HP, using no control, and exhausting to the atmosphere.

Under 40 CFR Part 63, Subpart ZZZZ (4Z), these emergency generators are considered affected units.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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 Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission units listed above:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(1)(iii
(4) 40 CFR 63.6595(a)(1) and (c)
(5) 40 CFR 63.6603(a)
(6) 40 CFR 63.6604(b)
(7) 40 CFR 63.6605
Emission Limitations and Standards  [326 IAC 2-7-5(1)]

E.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
DRAFT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Avery Dennison MFD
Source Address: 270 Westmeadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-39324-00407

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)
☐ Report (specify)
☐ Notification (specify)
☐ Affidavit (specify)
☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:
Part 70 Operating Permit

Emergency Occurrence Report

Source Name: Avery Dennison MFD
Source Address: 270 Westmeadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-39324-00407

This form consists of 2 pages

<table>
<thead>
<tr>
<th>□ This is an emergency as defined in 326 IAC 2-7-1(12)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</td>
</tr>
<tr>
<td>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Control Equipment:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Permit Condition or Operation Limitation in Permit:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Description of the Emergency:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Describe the cause of the Emergency:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency started:</td>
</tr>
<tr>
<td>-----------------------------</td>
</tr>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
</tbody>
</table>

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: ________________________________

Title / Position: ________________________________

Date: ________________________________

Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Avery Dennison MFD
Source Address: 270 Westmeadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-39324-00407
Facility: Coating head (CH-1) on vinyl casting/roll coating line L-2
Parameter: VOC Input
Limit: Shall not exceed 494.89 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.1)

| QUARTER: _______________ | YEAR: _______________ |

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Submitted by: ____________________________________________
Title / Position: ________________________________________
Signature: _____________________________________________
Date: _________________________________________________
Phone: _______________________________________________
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
**OFFICE OF AIR QUALITY**
**COMPLIANCE AND ENFORCEMENT BRANCH**

**Part 70 Quarterly Report**

Source Name: Avery Dennison MFD  
Source Address: 270 Westmeadow Place, Lowell, Indiana 46356  
Part 70 Permit No.: T089-39324-00407

### Facility:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

Parameter: VOC emissions, after control  
Limit: Shall not exceed 82.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.2)

<table>
<thead>
<tr>
<th>QUARTER: _____________</th>
<th>YEAR: _______________</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Submitted by: ________________________________  
Title / Position: ________________________________  
Signature: ________________________________  
Date: ________________________________  
Phone: ________________________________
Part 70 Quarterly Report

Source Name: Avery Dennison MFD
Source Address: 270 Westmeadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-39324-00407

<table>
<thead>
<tr>
<th>Facility:</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

Parameter: Single HAP emissions, after control
Limit: Shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Submitted by: ____________________________
Title / Position: ____________________________
Signature: ____________________________
Date: ____________________________
Phone: ____________________________
### Part 70 Quarterly Report

**Source Name:** Avery Dennison MFD  
**Source Address:** 270 Westmeadow Place, Lowell, Indiana 46356  
**Part 70 Permit No.:** T089-39324-00407  
**Facility:**

| Line ID |  
|---------|---|---|---|---|
| vinyl casting/roll coating line L-1 |  
| vinyl casting/roll coating line L-2 |  
| vinyl casting/roll coating line L-3 |  

**Parameter:** Combined HAP emissions, after control  
**Limit:** Shall not exceed 24.35 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
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<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
<td></td>
</tr>
</tbody>
</table>

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

Submitted by:  
Title / Position:  
Signature:  
Date:  
Phone:
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
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<tr>
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<tr>
<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
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<td></td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
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<tr>
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</tr>
<tr>
<td>Date of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Duration of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
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</tr>
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<tbody>
<tr>
<td>Date of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Duration of Deviation:</td>
<td></td>
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<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
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<td>Date of Deviation:</td>
<td></td>
<td></td>
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<tr>
<td>Duration of Deviation:</td>
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<td>Number of Deviations:</td>
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<td></td>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by:_____________________________

Title / Position: _______________________________

Date:_________________________________________

Phone:_________________________________________
Source Description and Location

Source Name: Avery Dennison MFD  
Source Location: 270 Westmeadow Place, Lowell, IN 46356  
County: Lake (West Creek)  
SIC Code: 2671 (Packaging Paper and Plastics Film, Coated and Laminated)  
Operation Permit No.: T 089-39324-00407  
Operation Permit Issuance Date: October 19, 2018  
Significant Permit Modification No.: 089-42985-00407  
Permit Reviewer: Olajumoke Kayode  

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 089-39324-00407 on October 19, 2018. The source has since received the following approval:

Administrative Amendment No. 089-41364-00407, issued on June 6, 2019.

County Attainment Status

The source is located in Lake County, West Creek Township.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.</td>
</tr>
<tr>
<td>O₃</td>
<td>Serious nonattainment effective September 23, 2019, for the 2008 8-hour ozone standard.</td>
</tr>
<tr>
<td>O₃</td>
<td>Marginal nonattainment effective August 3, 2018, for the 2015 8-hour ozone standard for Calumet Township, Hobart Township, North Township, Ross Township, and St. John Township. Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard for the remainder of the county.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards

U.S. EPA, in the Federal Register Notice 84 FR 44238 dated August 23, 2019, designated Lake County as serious nonattainment for the 2008 8-hour ozone standard effective September 23, 2019. On November 14, 2019, the Environmental Rules Board issued an emergency rule adopting the U.S. EPA’s designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(b) PM$_{2.5}$
Lake County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Lake 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 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](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.

### Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. 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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Modification (ton/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^{1,2}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>0.73</td>
<td>2.10</td>
<td>2.10</td>
<td>0.40</td>
<td>27.90</td>
<td>99.89</td>
<td>21.10</td>
<td>502.28 (Toluene)</td>
<td>868.28</td>
</tr>
</tbody>
</table>
Source-Wide Emissions Prior to Modification (ton/year)

<table>
<thead>
<tr>
<th>Source</th>
<th>PM$^1$</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>50</td>
<td>50</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>-</td>
<td>-</td>
<td>250</td>
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</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>50</td>
<td>50</td>
<td>NA</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

$^1$Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

$^2$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^3$Single highest source-wide HAP

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

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) Due to the U.S. EPA’s 2019 designation of Lake County as serious nonattainment for the 2008 8-hour ozone standard, this existing source is now a major stationary source, under Emission Offset (326 IAC 2-3), because VOC, a nonattainment regulated pollutant, is emitted at a rate of 50 tons per year or more.

(c) This existing source is a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs.

(d) These emissions are based on the TSD of Administrative Amendment No. 089-41364-00407, issued on June 6, 2019.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Avery Dennison MFD on June 19, 2020, relating to a request to modify the source’s permit to institute facility-wide federally-enforceable emission limits for single and combined HAPs to below major source thresholds (i.e., less than 10 tons per year for any single HAP and 25 tons per year for a combination of HAPs).

Avery Dennison MFD is currently subject to 40 CFR 63, Subpart JJJJ because it is a major source of Hazardous Air Pollutants (HAPs) under Section 112 of the Clean Air Act. The PTE of Toluene, Xylene and Cumene are each greater than ten (10) tons per year, and the PTE of total HAPs is greater than twenty-five (25) tons per year. These potential emissions are mainly from vinyl casting and roll coating lines L-1, L-2, and L-3, which share a common thermal oxidizer (C-1) as VOC control, and vent to a single stack (S-1). The thermal oxidizer, C-1 will now also serve as control for HAP emissions.

On January 25, 2018, the US EPA published a guidance memorandum revising the previous “once in, always in” policy regarding NESHAP applicability. EPA determined that a major source which takes an enforceable limit on its potential to emit (PTE) and takes measures to bring its HAP emissions below the applicable threshold becomes an area source, no matter when the source may choose to take measures to limit its PTE. Under this revised policy and with the requested HAPs limitations, Avery Dennison will be reclassified as an area source of HAPs and will no longer be subject to NESHAP Subpart JJJJ.

This request for a permit modification to establish federally enforceable HAP emission limits does not include any operational or equipment modifications, nor any changes to control equipment. Monthly HAP recordkeeping and emission calculations will be performed by the Source to demonstrate compliance with
the annual single and combined HAP limitations; and in addition to the existing Compliance Assurance Monitoring (CAM) for volatile organic compound (VOC) emissions at coating lines L-1, L-2, and L-3, CAM will also now apply to HAP emissions from the coating lines.

On October 2, 2020, the Office of Air Quality (OAQ) received a request from Avery Dennison MFD, relating to the following additional modifications to the permit:

(1) To remove the requirements of 40 CFR 60, Subpart RR, because Avery Dennison MFD cannot coat/apply adhesive materials on any coating lines at the source with the current facility equipment. Therefore, the facility is not subject to NSPS Subpart RR regulations regarding pressure sensitive adhesive application, and all reference to adhesives will be removed throughout the permit.

(2) To remove the applicability of 326 IAC 8-2-5 for paper coating, since the source can no longer apply adhesive coatings; and update the permit conditions to include the requirements for 326 IAC 8-2-11 for vinyl coating.

(3) To reduce the VOC input limit to the surface coating head CH-1 from 1,249.50 tons per year to 494.89 tons per year, based on the current maximum production levels.

(4) To reduce the control efficiency required by the thermal oxidizer (C-1) to comply with applicable emission limitations for VOC and HAPs from 98% to 96%. A control efficiency of 96% is sufficient for the thermal oxidizer, C-1 to comply with the currently permitted 82 tons per year of VOC emissions from the coating lines. This control percentage also limits HAP emissions to below 10 tons per year and 25 tons per year for individual and total HAPs respectively.

(5) To update the applicability of certain provisions of 40 CFR 63, Subpart ZZZZ, since the facility will move into being an area source of HAP after the federally enforceable emission limits for single and combined HAPs.

These additional modifications will not lead to increase in potential emissions at the source, and do not require construction approval because no new equipment is being added.

**Enforcement Issues**

There are no pending enforcement actions related to this modification.

**Emission Calculations**

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

**Permit Level Determination – Part 70 Modification to an Existing Source**

There are no new emission units or modifications to existing emission units (i.e., no physical change or change in the method of operation occurring at the source) as a result of this modification. See the "Description of Proposed Modification" section above for more detail.

Approval to Operate
Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification makes a significant change to existing monitoring conditions.

**PTE of the Entire Source After Issuance of the Part 70 Modification**

The table below summarizes the after-issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically...
enforceable in the permit. 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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
</tr>
</tbody>
</table>

$^1$Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

$^2$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^3$Single highest source-wide HAP

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

The source opted to take limit(s) in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.

(b) This existing major Emission Offset stationary source will continue to be major under 326 IAC 2-3 because the emissions of the nonattainment pollutant, VOC, will continue to be equal to or greater than the Emission Offset major source threshold.

(c) This existing major source of HAP will become an area source of HAP, as defined in 40 CFR 63.2, upon issuance of this modification because HAP emissions will be less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR and 326 IAC 12-1 have been removed from the permit for this source, since this source cannot coat/apply adhesive materials on any coating lines at the source with the current facility equipment.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.
National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ and 326 IAC 20-65 have been removed from the permit for this source, since this source is no longer a major source of HAPs. The source has opted to take limits for single and combined HAPs in order to become an area source of HAPs.

(b) The two emergency generators are still subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ, which is incorporated by reference as 326 IAC 20-82. The applicability of this rule is being reviewed since the source will move into being an area source of HAP after the federally-enforceable emission limits for single and combined HAPs.

The Emergency generators are subject to the following portions of Subpart ZZZZ:

1. 40 CFR 63.6580
2. 40 CFR 63.6585
3. 40 CFR 63.6590(a)(1)(iii)
4. 40 CFR 63.6595(a)(1) and (c)
5. 40 CFR 63.66023(a)
6. 40 CFR 63.6604(b)
7. 40 CFR 63.6605
8. 40 CFR 63.6625(e)(2), (f), (h), (i), (j)
9. 40 CFR 63.6635
10. 40 CFR 63.6640(a), (b), (e), and (f)
11. 40 CFR 63.6645(a)(5)
12. 40 CFR 63.6650
13. 40 CFR 63.6655(a)(e)(2), (f)(42)
14. 40 CFR 63.6660
15. 40 CFR 63.6665
16. 40 CFR 63.6670
17. 40 CFR 63.6675
18. Table 2dc to Subpart ZZZZ (4Z) of Part 63
19. Table 6 to Subpart ZZZZ (4Z) of Part 63
20. Table 7 to Subpart ZZZZ (4Z) of Part 63
21. Table 8 to Subpart ZZZZ (4Z) of Part 63

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the emergency generators except as otherwise specified in 40 CFR 63, Subpart ZZZZ.

(c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed modification.

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vinyl casting/roll coating line (L-1)/ HAPs (total and single)</td>
<td>TO</td>
<td>326 IAC 20 (Area Source Limits)</td>
<td>≥25 total ≥10 single</td>
<td>&lt;25 total &lt;10 single</td>
<td>Y</td>
<td>-</td>
</tr>
<tr>
<td>Vinyl casting/roll coating line (L-2)/ HAPs (total and single)</td>
<td>TO</td>
<td>326 IAC 20 (Area Source Limits)</td>
<td>≥25 total ≥10 single</td>
<td>&lt;25 total &lt;10 single</td>
<td>Y</td>
<td>-</td>
</tr>
<tr>
<td>Vinyl coating/roll coating line (L-3)/ HAPs (total and single)</td>
<td>TO</td>
<td>326 IAC 20 (Area Source Limits)</td>
<td>≥25 total ≥10 single</td>
<td>&lt;25 total &lt;10 single</td>
<td>Y</td>
<td>-</td>
</tr>
</tbody>
</table>

Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant.

Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, and CO) is 100 tpy, for NOx and VOC 50 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

Controls: TO = Thermal Oxidizer

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to coating lines L-1, L-2, and L-3, which is each considered as an "other unit," for Single HAP and Combined HAPs upon issuance of the next Part 70 Permit Renewal. A CAM plan must be submitted as part of the Part 70 Operating Permit Renewal application.

**State Rule Applicability - Entire Source**

Due to this modification, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).
The operation of this source will now 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 subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, is located in Lake County, and emits NOx and VOC into the ambient air at levels equal to or greater than twenty-five (25) tons per year. Pursuant to 326 IAC 2-6-3(a)(1) and 326 IAC 2-6-3(a)(2), the Permittee shall submit, by July 1, an emission statement covering the previous calendar year as follows:

(a) triennially, in accordance with the compliance schedule in 326 IAC 2-6-3, and

(b) each year when the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2)

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)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Lake County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
This source (located in Lake County) is not one of the sources specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11. 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 6.8-1-2 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 6.8-10 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Lake County) is not subject to the requirements of 326 IAC 6.8-10 because it is not one of the sources specifically listed in 326 IAC 6.8-10-1(2)(A) through (V) and the source-wide PTE of fugitive PM and PM10 is less than 5 tons per year, each.
326 IAC 20 (Hazardous Air Pollutants)
In order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:

(a) The total emissions of each single HAP after control from coating lines L-1, L-2, and L-3 shall not exceed 9.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The total emissions of any combination of HAPs after control from coating lines L-1, L-2, and L-3 shall not exceed 24.35 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

State Rule Applicability – Individual Facilities

Due to this modification, state rule applicability has been reviewed as follows:

Vinyl casting/ Roll coating lines L-1, L-2 and L-3

326 IAC 8-2-5 (VOC Rules: Paper coating operation)
The vinyl casting/ roll coating lines L-1, L-2 and L-3 are no longer subject to the requirements of 326 IAC 8-2-5 for paper coating since these lines no longer apply adhesive coatings. The coating lines are now subject to the requirements of 326 IAC 8-2-11.

326 IAC 8-2-11 (VOC Rules: Fabric and vinyl coating operation)
The vinyl casting/ roll coating lines L-1, L-2 and L-3 are now subject to the requirements of 8-2-11 for vinyl coating, since the lines are vinyl coating lines that existed on or before July, 1990, are located in Lake county, and have VOC emissions before control that is each greater than 15 pounds per day.

Pursuant to 326 IAC 8-2-11(b), the Permittee shall comply with either of the following:

(a) Limit the VOC content of coating to 4.8 pounds per gallon, excluding water, delivered to the coating applicator from a vinyl coating line.

(b) Install add on capture and control devices with an overall control efficiency of not less than 67.5 percent which shall meet:

(1) Capture efficiency of at least 75%; and

(2) Control efficiency from the control devices of at least 90%. In the case of incineration, the system shall have a destruction efficiency of 90% which will reduce VOC to carbon dioxide and water.

This source will comply with the limit specified in (a) above by using compliant coatings.

This source will comply with the limit specified in (b) by using the existing thermal oxidizer C-1.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous
demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Compliance with the Single and combined HAP limits shall be determined by obtaining from the manufacturer the copies of the “as supplied” and “as applied” HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 311- Analysis of Hazardous Air Pollutants Compound in Paints and Coatings, or other test methods as approved by the commissioner. HAP emissions shall be determined using the following equations:

\[
\text{Equation 1: Single HAP Emissions tons/month} = \text{Single HAP Input tons/month} \times (1 - \text{CE})
\]

\[
\text{Equation 2: Total HAPs emissions tons/month} = \text{Sum of Single HAP equations}
\]

Where:

\[
\text{CE} = \text{Overall HAP control efficiency \% for the thermal oxidizer C-1. This value shall equal 90\% unless an IDEM approved test is conducted in which case the value shall equal that determined from the most recent valid compliance determination.}
\]

**Testing Requirements:**

**Thermal Oxidizer (C-1)**

The thermal oxidizer C-1 serving as HAP control for the coating lines L-1, L-2, and L-3 has existing testing requirements, since it also serves as VOC control for the same coating lines.

The existing testing frequency for the thermal oxidizer C-1 will not change since the HAPs are also Volatile Organic Compounds, and the HAPs will be included in the testing requirement. The source performed stack testing of the thermal oxidizer C-1 on June 21, 2019, and shall continue to comply with the applicable requirements and permit conditions for the thermal oxidizer C-1 as contained in Part 70 Operating Permit No. 089-39324-00407, issued on October 19, 2018.

Based on the most recent test conducted on C-1, its overall control efficiency is 99.6%.

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thermal oxidizer (C-1)</td>
<td>3-hour average oxidizer temperature monitoring</td>
<td>Continuous</td>
<td>The value established in the most recent compliant stack test.</td>
</tr>
<tr>
<td></td>
<td>Duct pressure or fan amperage monitoring</td>
<td>Daily</td>
<td>Within the range established in the most recent compliant stack test.</td>
</tr>
</tbody>
</table>
These monitoring conditions are necessary because the thermal oxidizer for the coating lines L-1, L-2 and L-3 must operate properly to assure compliance with the area source HAP limits.

### Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as **strikethrough** text and new language appears as **bold** text (these changes may include Title I changes):

1. IDEM, OAQ has made changes to the language in Section A - General Information of the permit to re-classify the source as a Minor source of HAPs:

2. Based on the reclassification of Lake County to serious nonattainment for the 2008 ozone standard, IDEM, OAQ made changes to the language in Section A - General Information of the permit to specify that the Source is major under Emission Offset rules.

3. IDEM OAQ has updated the description of vinyl casting and roll coating lines L-1 through L-3 to indicate that the thermal oxidizer also serves as control for HAP emissions, and that these lines cannot apply pressure sensitive adhesive materials.

4. IDEM, OAQ has removed attachment B (40 CFR Part 63, Subpart JJJJ (4J) - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating) from the permit.

5. IDEM, OAQ has removed attachment A (40 CFR Part 60, Subpart RR (2R) - New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations from the permit.

6. IDEM, OAQ has revised the VOC input limit to the surface coating head CH-1 from 1,249.50 tons per year to 494.89 tons per year.

7. IDEM, OAQ has revised the control efficiency required by the thermal oxidizer (C-1) to comply with applicable emission limitations for VOC and HAPs from 98% to 96%.

8. IDEM OAQ has updated the compliance determination, testing, compliance monitoring, record keeping and reporting requirements of the permit.

9. IDEM OAQ has updated the applicability of certain provisions of 40 CFR 63, Subpart ZZZZ, since the facility will move into being an area source of HAP emissions.

10. IDEM, OAQ has removed the applicability of 326 IAC 8-2-5 from the permit, since the source can no longer apply adhesive coatings.

11. IDEM, OAQ has updated the permit conditions to include the requirements for 326 IAC 8-2-11 for vinyl coating.
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary vinyl coating operation.

Source Address: 270 Westmeadow Place, Lowell, Indiana 46356
General Source Phone Number: 219-690-4015
SIC Code: 2671 (Packaging Paper and Plastics Film, Coated and Laminated)
County Location: Lake
Source Location Status: Nonattainment for 8-hour ozone standard
Attainment for all other criteria pollutants
Source Status: Part 70 Operating Permit Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) pressure-sensitive vinyl casting/roll coating line, identified as L-1, constructed on July 1, 1980, approved in 2020 to remove the use of adhesive coatings, with a maximum capacity of 25,313 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 4.0 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

Under 40 CFR Part 63, Subpart JJJJ (4J), L-1 is considered an existing web coating line.

(b) One (1) pressure-sensitive vinyl casting/roll coating line, identified as L-2, constructed on December 1, 1984 and modified in 2001 to add one (1) surface coating head, approved in 2020 to remove the use of adhesive coatings, identified as CH-1, with a total maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

Under 40 CFR Part 63, Subpart JJJJ (4J), L-2 is considered an existing web coating line.
Under 40 CFR Part 60, Subpart RR, L-2 is considered an affected facility.

(c) One (1) pressure-sensitive vinyl casting/and adhesive roll coating line, identified as L-3, constructed on June 1, 1988, approved in 2020 to remove the use of adhesive coatings, with a maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.

Under 40 CFR Part 63, Subpart JJJJ (4J), L-3 is considered an existing web coating line.
Under 40 CFR Part 60, Subpart RR, L-3 is considered an affected facility.

Thermal oxidizer (C-1) is a common control for L-1, L-2, and L-3.
C-1 is not used when emulsion coating is used.

(d) One (1) natural gas-fired thermal oxidizer, identified as C-1, constructed in 2011, with a total heat input capacity of 28.46 million Btu per hour, controlling VOC and HAP emissions from L-1, L-2, and L-3, except when using an emulsion coating in L-1, L-2 and L-3, exhausting to stack S-1, and consisting of the following:
(1) Two (2) burners each rated at 3.2 million Btu per hour;

(2) Two (2) injectors each rated at 2.5 million Btu per hour; and

(3) One (1) hot oil burner rated at 17.06 million Btu per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

(2) This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) One (1) dry material dump station, identified as **Dry Base Compounding**, with a maximum capacity of 213.35 pounds of material per hour, controlled by a 1,600 cfm dust collector, and exhausting indoors;

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) One (1) pressure-sensitive vinyl casting/roll coating line, identified as L-1, constructed on July 1, 1980, <strong>approved in 2020 to remove the use of adhesive coatings</strong>, with a maximum capacity of 25,313 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 4.0 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1.</td>
</tr>
</tbody>
</table>

**Under 40 CFR Part 63, Subpart JJJJ (4J), L-1 is considered an existing web coating line.**

(b) One (1) pressure-sensitive vinyl casting/roll coating line, identified as L-2, constructed on December 1, 1984 and modified in 2001 to add one (1) surface coating head, identified as CH-1, **approved in 2020 to remove the use of adhesive coatings**, with a total maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1. |

**Under 40 CFR Part 63, Subpart JJJJ (4J), L-2 is considered an existing web coating line.**

**Under 40 CFR Part 60, Subpart RR, L-2 is considered an affected facility.**

(c) One (1) pressure-sensitive vinyl casting/and adhesive roll coating line, identified as L-3, constructed on June 1, 1988, **approved in 2020 to remove the use of adhesive coatings**, with a maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC and HAP control (except when using an emulsion coating), exhausting to stack S-1. |

**Under 40 CFR Part 63, Subpart JJJJ (4J), L-3 is considered an existing web coating line.**

**Under 40 CFR Part 60, Subpart RR, L-3 is considered an affected facility.**

**Thermal oxidizer (C-1) is a common control for L-1, L-2, and L-3. C-1 is not used when emulsion coating is used.**

(d) One (1) natural gas-fired thermal oxidizer, identified as C-1, constructed in 2011, with a total heat input capacity of 28.46 million Btu per hour, controlling VOC and HAP emissions from L-1, L-2, and L-3, except when using an emulsion coating in L-1, L-2 and L-3, exhausting to stack S-1, and consisting of the following:

(1) Two (2) burners each rated at 3.2 million Btu per hour;
(2) Two (2) injectors each rated at 2.5 million Btu per hour; and

(3) One (1) hot oil burner rated at 17.06 million Btu per hour.

(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 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-7]

Pursuant to 326 IAC 2-7-10.5(d)(9) (Repealed), MSM 089-12713-00407, issued on December 14, 2000, and as revised by Part 70 renewal permit T089-39324-00407, issued on October 19, 2018 and as revised in SPM 089-42985-00407:

(a) The VOC input to surface coating head CH-1, part of L-2, shall not exceed 1,249.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Thermal oxidizer C-1 shall control VOC emissions from CH-1 and achieve a minimum overall efficiency of ninety-eight percent (98%).

Compliance with these limits will limit the VOC emissions after control from CH-1 to less than 25 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7-10.5(g) not applicable to CH-1.

The table below summarizes the comparison of the limits, with the assumption that capture efficiency is 100%:

<table>
<thead>
<tr>
<th>VOC input to CH-1 (tons/year)</th>
<th>Thermal oxidizer (C-1) Control Efficiency</th>
<th>VOC Emission after control (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing 1,249.50</td>
<td>98%</td>
<td>24.99</td>
</tr>
<tr>
<td>New 494.89</td>
<td>96%</td>
<td>19.8</td>
</tr>
</tbody>
</table>

Based on the most recent test conducted on C-1, its overall control efficiency is 99.6%.

D.1.2 Emission Offset Minor Limit VOC [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 not applicable, the Permittee shall comply with the following:

The combined VOC emissions, after control, of the following emission units:

<table>
<thead>
<tr>
<th>Line ID</th>
<th>pressure-sensitive vinyl casting/roll coating line L-1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/ and adhesive roll coating line L-3</td>
</tr>
</tbody>
</table>

shall not exceed 82.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-3 (Emission Offset) not applicable.
D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

(a) Pursuant to 326 IAC 8-2-5(b), the Permittee shall not discharge into the atmosphere VOC in excess of 2.9 pounds of VOC per gallon of coating, excluding water, delivered to the applicators of the following:

<table>
<thead>
<tr>
<th>Line ID</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting and adhesive roll coating line L-3</td>
</tr>
</tbody>
</table>

(b) Pursuant to 326 IAC 8-2-5(c), on and after April 1, 2011, the Permittee shall comply with the following:

(A) For the following coating lines which have potential VOC emissions of twenty-five (25) tons per year or greater:

<table>
<thead>
<tr>
<th>Line ID</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting and adhesive roll coating line L-3</td>
</tr>
</tbody>
</table>

the following VOC emission limitations apply:

(i) Two tenths (0.2) lb VOC/lb solids applied for pressure sensitive tape and label coating.

(ii) Four tenths (0.4) lb VOC/lb solids applied for paper, film, and foil coating.

(B) As an alternative to Condition D.1.3(b)(A), the Permittee may achieve compliance using a capture and control device that achieves a minimum overall VOC control efficiency of ninety percent (90%).

(C) The Permittee may also achieve compliance by using a combination of Condition D.1.3(b)(A) and (B).

The required overall add-on control efficiency, when combining add-on control with low VOC coatings, must be determined using 326 IAC 8-1-2(c), except that the units for actual VOC content and equivalent emissions limit is in pound of VOC per pound of coating solids instead of pound of VOC per gallon of coating solids.

(D) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for cleaning material, and cleaning-related waste materials. Work practices shall include, but not be limited to, the following:

(i) Store all VOC containing materials in closed containers.

(ii) Ensure that mixing and storage containers used for VOC containing materials are kept closed at all times except when depositing or removing these materials.

(iii) Minimize spills of VOC containing cleaning materials.

(iv) Convey VOC containing cleaning materials from one (1) location to another in closed containers or pipes.
Minimize VOC emissions from the cleaning of storage, mixing, and conveying equipment.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11(b)(1)(B) and 326 IAC 8-2-11(b)(2), the Permittee shall comply with either of the following:

(a) Limit the VOC content of coating to 4.8 pounds per gallon, excluding water, delivered to the coating applicator from a vinyl coating line; or

(b) Install add on capture and control devices with an overall control efficiency of not less than 67.5 percent (67.5 %) which shall meet:

(1) Capture efficiency of at least 75%; and

(2) Control efficiency from the control devices of at least 90%. In the case of incineration, the system shall have a destruction efficiency of 90% which will reduce VOC to carbon dioxide and water.

D.1.4 Hazardous Air Pollutant (HAP) Minor Limits [326 IAC 20] [40 CFR 63]

In order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:

HAP emissions after control from the following lines:

<table>
<thead>
<tr>
<th>Line ID</th>
<th>Pollutants</th>
<th>Tons per twelve (12) consecutive month period</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
<td>Total HAPs</td>
<td>24.35</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
<td>Single HAP</td>
<td>9.90</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

shall not exceed the emissions limits specified in the table below, with compliance determined at the end of each month:

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] Thermal Oxidixer Operation

(a) VOC
Pursuant to 326 IAC 8-1-2(a) and in order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3(b), the natural gas-fired thermal oxidizer C-1 for VOC and HAP control shall be in operation at all times the following are operating:

<table>
<thead>
<tr>
<th>Line ID</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td></td>
<td>pressure-sensitive vinyl casting/ and adhesive roll coating line L-3</td>
</tr>
</tbody>
</table>

(b) HAP

In order to demonstrate compliance with Condition D.1.4, the natural gas-fired thermal oxidizer C-1 for HAP control shall be in operation at all times the following are operating:

<table>
<thead>
<tr>
<th>Line ID</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td></td>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td></td>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

D.1.6 7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

(b) In order to demonstrate compliance with the VOC emission limitation in Condition D.1.1, the Permittee shall determine VOC emissions for each month, using the following methodology:

\[
\text{VOC Emissions CH-1} = \text{[VOC input} \times (1-\text{CE})\]

Where:

\[
\text{VOC input} = \text{total VOC applied (coating and solvents) in CH-1}
\]

\[
\text{CE} = \text{Overall control efficiency of the thermal oxidizer (C-1) from the most recent stack test approved by IDEM}
\]

(c) In order to demonstrate compliance with the VOC emission limitation in Condition D.1.2, the Permittee shall determine VOC emissions for each month, using the following methodology:

\[
\text{VOC Emissions (total)} = \text{VOC Emissions (L-1) + VOC Emissions (L-2)}
\]

\[
+ \text{VOC Emissions (L-3)}
\]

(i) VOC Emissions (per coating line) = \text{[VOC input appliedp} \times (1-\text{CEp})\]

Where:

\[
\text{VOC input appliedp} = \text{total VOC applied (coating and solvents) in each of the roll coating lines}
\]

\[
\text{CEp} = \text{Overall control efficiency of the thermal oxidizer (C-1) from the most recent stack test approved by IDEM}
\]

(c) When using non-compliant coatings, the Permittee shall comply with the following:

(1) Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the following:
shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in Condition D.1.3.

This equivalency was determined by the following equation:

\[ E = \frac{L}{1 - \frac{L}{D}} \]

Where:

- \( E \) = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied;
- \( L \) = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- \( D \) = Density of VOC in coating in pounds per gallon of VOC.

A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

The pounds of VOC per gallon of coating solids shall be limited to less than or equal to 4.79 pounds of VOC per gallon coating solids as applied.

(2) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

\[ O = \frac{V - E \times 100}{V} \]

Where:

- \( O \) = Equivalent overall efficiency of the capture system and control device as a percentage;
- \( V \) = The actual VOC content of the coatings as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied;
- \( E \) = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

The overall control efficiency of the thermal oxidizer (C-1) shall be greater than or equal to 92.6.

D.1.8 Hazardous Air Pollutants (HAP)

(a) Compliance with the single and combined HAP limits in Condition D.1.4 shall be determined by obtaining from the manufacturer the copies of the “as supplied” and “as applied” HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 311- Analysis of Hazardous Air Pollutants Compound in Paints and Coatings, or other test methods as approved by the commissioner.
(b) HAP emissions after control from the following lines:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

shall be determined using the following equations:

Equation 1: Single HAP Emissions tons/month = Single HAP Input tons/month x (1 - CE)

Equation 2: Total HAPs emissions tons/month = Sum of Single HAP Emissions

Where:

CE= Overall HAP control efficiency % of the thermal oxidizer C-1 from the most recent stack test approved by IDEM.

D.1.7.9 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3(b), and D.1.4, the Permittee shall conduct performance tests to determine the VOC and HAP capture and destruction efficiencies (overall efficiency) of thermal oxidizer C-1 at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.8 Thermal Oxidizer Compliance Monitoring [40 CFR Part 64]

Pursuant to 40 CFR Part 64, the Permittee shall comply with the requirements of 40 CFR 63.3350(a), (b), (e), and (f) of 40 CFR Part 63, Subpart JJJJ, when operating a thermal oxidizer used to control emissions from the following:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>pressure-sensitive vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>pressure-sensitive vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>pressure-sensitive vinyl casting and adhesive roll coating line L-3</td>
</tr>
</tbody>
</table>

D.1.10 Thermal Oxidizer Temperature [40 CFR 64]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring the operating temperature. For purposes of this condition, continuous mean no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour averages.

(b) The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, D.1.3(b), and D.1.4.

(c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test when applying the VOC and HAP control demonstrated during the most recent testing event.

(d) If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, and the Permittee desires the use of the most recent (and higher destruction) VOC and control demonstration data, the Permittee shall take a reasonable response to return the operating unit temperature to that demonstrated during the most recent
compliance test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Temperature monitoring data that indicates lower than the most recent demonstrated testing but above the unit operating baseline (controls at or above 96%) will not be considered a CAM excursion.

D.1.11 Thermal Oxidizer Duct Pressure or Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage for thermal oxidizer or other enclosure monitoring methods from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, D.1.3(b), and D.1.4.

(b) The duct pressure, fan amperage, or other capture monitoring system shall be observed at least once per day when the VOC controls and thermal oxidizer system is in operation. On and after the date the stack test results are available, the duct pressure, fan amperage, or other capture monitoring parameters/methods shall be maintained within the normal range as established in the baseline monitoring or latest compliant stack test as appropriate.

(c) When, for any one reading, the duct pressure, fan amperage, or other enclosure operating parameter is outside the above mentioned range, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.9.12 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below for the following:

<table>
<thead>
<tr>
<th>Line ID</th>
<th>Pressure-sensitive vinyl casting/roll coating line L-1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pressure-sensitive vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td></td>
<td>Pressure-sensitive vinyl casting/ and adhesive roll coating line L-3</td>
</tr>
</tbody>
</table>

Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on monthly basis.

(A) Records shall include purchase orders, process consumption records, invoices, manufacturer's formulation data, and/or safety data sheets (SDS) or other supplier provided information and material testing necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(b) To document the compliance status with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the limits established in Condition D.1.4. Records
necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent used on monthly basis.

Records shall include purchase order, process consumption records, invoices, manufacturer's formulation data and/or safety data sheets (SDS) necessary to verify the type and amount used.

(3) The total emissions of each single HAP from the following for each month and each compliance period:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

Records of emissions for each single HAP are only required when the total combined HAP emissions exceed 10 tons per year.

(4) The total emissions of any combination of HAPs from the following for each month and each compliance period:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

(b) (c) To document the compliance status with Conditions D.1.1, D.1.2, D.1.4 and D.1.69, the Permittee shall maintain records of the test results.

(d) To document the compliance status with Condition D.1.11, the Permittee shall maintain daily records of the duct pressures or fan amperages for the thermal oxidizer C-1. The Permittee shall include in its daily record when a duct pressure or fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g. the process did not operate that day).

(e) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.40 13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1(a), and D.1.2 and D.1.4 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements 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).
### Emissions Unit Description:

**E.1.1 NSPS RESERVED**

(b) One (1) pressure-sensitive vinyl casting/roll coating line, identified as L-2, constructed on December 1, 1984 and modified in 2001 to add one (1) surface coating head, identified as CH-1, with a total maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC control (except when using an emulsion coating), exhausting to stack S-1.

Under 40 CFR Part 63, Subpart JJJJ (4J), L-2 is considered an existing web coating line.

Under 40 CFR Part 60, Subpart RR, L-2 is considered an affected facility.

(c) One (1) pressure-sensitive vinyl casting and adhesive roll coating line, identified as L-3, constructed on June 1, 1988, with a maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC control (except when using an emulsion coating), exhausting to stack S-1.

Under 40 CFR Part 63, Subpart JJJJ (4J), L-3 is considered an existing web coating line.

Under 40 CFR Part 60, Subpart RR, L-3 is considered an affected facility.

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

### New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

- **E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]**
  - (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 60, Subpart RR.

  - (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports 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  46204-2254

- **E.1.2 Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations NSPS [326 IAC 12][40 CFR Part 60, Subpart RR]**

  The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart RR (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission units listed above:

  1. 40 CFR 60.440
  2. 40 CFR 60.441
  3. 40 CFR 60.442(a)(2)
  4. 40 CFR 60.443(b), (d), (e), (f), (g) and (i)
Compliance Determination Requirements [326 IAC 2-7-5(1)]

E.1.3 Testing Requirements [326 IAC 2-1.1-11][326 IAC 2-7.6(1)][326 IAC 2-7-5(1)]

In order to document the compliance status with Condition E.1.2, the Permittee shall perform the testing required under 40 CFR 60, Subpart RR, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

SECTION E.2 NESHAP

Reserved

Emissions Unit Description:

(a) One (1) pressure-sensitive vinyl casting/roll coating line, identified as L-1, constructed on July 1, 1980, with a maximum capacity of 25,313 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 4.0 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC control (except when using an emulsion coating), exhausting to stack S-1.

Under 40 CFR Part 63, Subpart JJJJ (4J), L-1 is considered an existing web coating line.

(b) One (1) pressure-sensitive vinyl casting/roll coating line, identified as L-2, constructed on December 1, 1984 and modified in 2001 to add one (1) surface coating head, identified as CH-1, with a total maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC control (except when using an emulsion coating), exhausting to stack S-1.

Under 40 CFR Part 63, Subpart JJJJ (4J), L-2 is considered an existing web coating line.

(c) One (1) pressure-sensitive vinyl casting and adhesive roll coating line, identified as L-3, constructed on June 1, 1988, with a maximum capacity of 46,688 square feet of substrate per hour, including a three-zone natural gas-fired oven rated at 5.6 MMBtu/hr, and using a natural gas-fired thermal oxidizer (C-1) for VOC control (except when using an emulsion coating), exhausting to stack S-1.

Under 40 CFR Part 63, Subpart JJJJ (4J), L-3 is considered an existing web coating line.

(d) One (1) natural gas-fired thermal oxidizer, identified as C-1, constructed in 2011, with a total heat input capacity of 28.46 million Btu per hour, controlling VOC emissions from L-1, L-2, and L-3, except when using an emulsion coating in L-1, L-2, and L-3, exhausting to stack S-1, and consisting of the following:

(1) Two (2) burners each rated at 3.2 million Btu per hour.

Thermal oxidizer (C-1) is a common control for L-1, L-2, and L-3. C-1 is not used when emulsion coating is used.
(2) Two (2) injectors each rated at 2.5 million Btu per hour; and

(3) One (1) hot oil burner rated at 17.06 million Btu per hour.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJJJ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.2.2 National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating NESHAP [40 CFR Part 63, Subpart JJJJ][326 IAC 20-65]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJJJ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-65, for the emission units listed above:

(1) 40 CFR 63.3280
(2) 40 CFR 63.3290
(3) 40 CFR 63.3300
(4) 40 CFR 63.3310
(5) 40 CFR 63.3320
(6) 40 CFR 63.3321
(7) 40 CFR 63.3330
(8) 40 CFR 63.3340
(9) 40 CFR 63.3350
(10) 40 CFR 63.3360
(11) 40 CFR 63.3370
(12) 40 CFR 63.3400
(13) 40 CFR 63.3410
(14) 40 CFR 63.3420
(15) Tables 1 to Subpart JJJJ (4J) of Part 63
(16) Tables 2 to Subpart JJJJ (4J) of Part 63

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

E.2.3 Testing Requirements [326 IAC 2-1.1-11][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In order to document the compliance status with Condition E.2.2, the Permittee shall perform the testing required under 40 CFR 63, Subpart JJJJ, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance
demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

**SECTION E.3  NESHAP**

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Insignificant Activities:</strong></td>
</tr>
<tr>
<td>(a) Two (2) emergency generators:</td>
</tr>
<tr>
<td>(1) One (1) natural gas-fired emergency generator, installed in 2005, with a maximum output horsepower rating (hp) of 25 HP, using no control, and exhausting to the atmosphere;</td>
</tr>
<tr>
<td>(2) One (1) diesel-fired emergency generator, installed on February 2, 2005, with a maximum output horsepower rating (hp) of 500 HP, using no control, and exhausting to the atmosphere.</td>
</tr>
</tbody>
</table>

Under 40 CFR Part 63, Subpart ZZZZ (4Z), these emergency generators are considered affected units.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**


- Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

- Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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 Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission units listed above:

- 40 CFR 63.6580
- 40 CFR 63.6585
- 40 CFR 63.6590(a)(1)(iii)
- 40 CFR 63.6595(a)(1) and (c)
- 40 CFR 63.66023(a)
- 40 CFR 63.6604(b)
- 40 CFR 63.6605
(8) 40 CFR 63.6625(e)(2), (f), (h), (i), (j)
(9) 40 CFR 63.6635
(10) 40 CFR 63.6640(a), (b), (e), and (f)
(11) 40 CFR 63.6645(a)(5)
(12) 40 CFR 63.6650
(13) 40 CFR 63.6655(a)(e)(2), (f)(42)
(14) 40 CFR 63.6660
(15) 40 CFR 63.6665
(16) 40 CFR 63.6670
(17) 40 CFR 63.6675
(18) Table 2dc to Subpart ZZZZ (4Z) of Part 63
(19) Table 6 to Subpart ZZZZ (4Z) of Part 63
(20) Table 7 to Subpart ZZZZ (4Z) of Part 63
(21) Table 8 to Subpart ZZZZ (4Z) of Part 63

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

E.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
Parameter: VOC emissions, after control
Limit: Shall not exceed 82.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.2)

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

Part 70 Quarterly Report

Source Name: Avery Dennison MFD
Source Address: 270 Westmeadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-39324-00407

Facility:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

Parameter: Single HAP emissions, after control
Limit: Shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: ___________  YEAR: ___________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: ______________________________
Title / Position: ______________________________
Signature: ______________________________
Date: ______________________________
Phone: ______________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Avery Dennison MFD
Source Address: 270 Westmeadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-39324-00407
Facility:

<table>
<thead>
<tr>
<th>Line ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>vinyl casting/roll coating line L-1</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-2</td>
</tr>
<tr>
<td>vinyl casting/roll coating line L-3</td>
</tr>
</tbody>
</table>

Parameter: Combined HAP emissions, after control
Limit: Shall not exceed 24.35 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
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<th>QUARTER: ___________</th>
<th>YEAR: ___________</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

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

Submitted by: __________________________________________
Title / Position: _______________________________________
Signature: ___________________________________________
Date: _______________________________________________
Phone: _______________________________________________
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 June 19, 2020. Additional information was received on October 2, 2020.

The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 089-42985-00407.

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification be approved.

IDEEM Contact

(a) If you have any questions regarding this permit, please contact Olajumoke Kayode, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5373 or (800) 451-6027, and ask for Olajumoke Kayode or (317) 234-5373.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](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](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](http://www.in.gov/idem/6900.htm).
### Appendix A: Emissions Calculations

**Source Summary**

- **Company Name:** Avery Dennison MFD
- **Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356
- **Permit Number:** T089-42985-00407
- **Reviewer:** Olajumoke Kayode

#### Unlimited Potential to Emit (tons/yr)

<table>
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<tr>
<th>Process</th>
<th>Emission Unit ID</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAPs</th>
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</thead>
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<td>Roll Coating Line</td>
<td>L-1</td>
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<td></td>
<td></td>
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<td>1.42</td>
<td>0.11</td>
<td>18.75</td>
<td>1.03</td>
<td>15.75</td>
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<td>0.34</td>
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<td>0.0004</td>
<td>0.0009</td>
<td>0.0009</td>
<td>0.00003</td>
<td>0.10</td>
<td>0.001</td>
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#### Limited Potential to Emit (tons/yr)

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<th>Process</th>
<th>Emission Unit ID</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAPs</th>
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<tbody>
<tr>
<td>Roll Coating Line</td>
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<td>82.0</td>
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<td></td>
<td></td>
<td></td>
<td>24.35</td>
<td>9.90</td>
</tr>
<tr>
<td>Adhesive Roll Coating Line</td>
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<td>0.0015</td>
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<tr>
<td>Natural Gas Combustion - TO and ovens</td>
<td>N/A</td>
<td>0.36</td>
<td>1.42</td>
<td>1.42</td>
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<td><strong>Total</strong></td>
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<td>99.89</td>
<td>21.10</td>
<td>24.95</td>
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#### Notes:
- *Pursuant to 326 IAC 2-7-10.5(d)(9) (repealed) and MSM 089-12713-00407, issued December 14, 2000, as revised by Part 70 Renewal permit T089-39324-00407, issued on October 19, 2018 and as revised in SPM 089-42985-00407, VOC input to CH-1, shall not exceed 494.89 tons/yr, and the thermal oxidizer shall achieve a minimum overal efficiency of 96%.
- The shaded cells indicate where limits are applied
### Appendix A: Emissions Calculations

#### Source Summary - HAPs

**Company Name:** Avery Dennison MFD  
**Address:** City IN Zip: 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

#### Unlimited Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Process</th>
<th>Emission Unit ID</th>
<th>Toluene</th>
<th>Xylene</th>
<th>Cumene</th>
<th>Ethylbenzene</th>
<th>Hexane</th>
<th>Formaldehyde</th>
<th>Tetrachloroethylene</th>
<th>Total HAPs</th>
</tr>
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<tbody>
<tr>
<td>Roll Coating Line</td>
<td>L-1</td>
<td>0.00</td>
<td>35.44</td>
<td>36.72</td>
<td>1.28</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>73.44</td>
</tr>
<tr>
<td>Roll Coating Line / Coating Head (CH-1)</td>
<td>L-2</td>
<td>502.28</td>
<td>71.89</td>
<td>73.43</td>
<td>0.00E+00</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>647.60</td>
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<tr>
<td>Adhesive Roll Coating Line</td>
<td>L-3</td>
<td>27.50</td>
<td>54.99</td>
<td>63.39</td>
<td>0.76</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>146.65</td>
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<tr>
<td>Natural Gas Combustion TO &amp; ovens</td>
<td>N/A</td>
<td>6.37E-04</td>
<td>-</td>
<td>-</td>
<td>0.34</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>0.35</td>
</tr>
<tr>
<td>Natural Gas Emergency Gen.</td>
<td>N/A</td>
<td>2.02E-05</td>
<td>9.14E-06</td>
<td>-</td>
<td>-</td>
<td>9.61E-04</td>
<td>-</td>
<td>-</td>
<td>1.51E-03</td>
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<td>Diesel Emergency Gen.</td>
<td>N/A</td>
<td>3.58E-04</td>
<td>2.49E-04</td>
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<td>-</td>
<td>-</td>
<td>1.03E-03</td>
<td>-</td>
<td>3.39E-03</td>
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<tr>
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<td>-</td>
<td>-</td>
<td>0.09</td>
<td>0.00E+00</td>
<td>-</td>
<td>-</td>
<td>0.10</td>
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<tr>
<td>Degreasing</td>
<td>N/A</td>
<td>4.86E-04</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>9.72E-04</td>
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<tr>
<td>Dry Compounding</td>
<td>N/A</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Eight (8) Mixers</td>
<td>N/A</td>
<td>5.70E-04</td>
<td>0.07</td>
<td>0.07</td>
<td>2.28E-03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.14</td>
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<td>Drum Wash</td>
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<td>-</td>
<td>3.23E-05</td>
<td>3.44E-05</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2.10E-04</td>
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<tr>
<td>Churn Wash</td>
<td>N/A</td>
<td>-</td>
<td>6.32E-05</td>
<td>6.73E-05</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>1.02E-06</td>
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<td>Solvent recycling distillation</td>
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<td>-</td>
<td>5.98E-06</td>
<td>6.37E-06</td>
<td>9.65E-08</td>
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<td>-</td>
<td>-</td>
<td>1.33E-05</td>
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<td>Storage Tanks</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Paved Roads</td>
<td>N/A</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td><strong>Total</strong></td>
<td></td>
<td>529.77</td>
<td>162.39</td>
<td>173.62</td>
<td>2.05</td>
<td>0.43</td>
<td>0.02</td>
<td>0.001</td>
<td>868.28</td>
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</table>
Appendix A: Emissions Calculations
Insignificant Mixers and Drum & Churn Wash

Company Name: Avery Dennison MFD
Address City IN Zip: 270 Westmeadow Place, Lowell, IN 46356
Permit Number: T089-42985-00407
Reviewer: Olayomide Kayode

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Construction Date</th>
<th>Control Device</th>
<th>Stack ID or Fugitive</th>
<th>Process</th>
<th>Potential Throughput (lbs/yr)</th>
<th>Emission Factor (lb VOC/lb)</th>
<th>wt% Total HAP</th>
<th>wt% Toluene</th>
<th>wt% Xylene</th>
<th>wt% Cumene</th>
<th>wt% Ethyl Benzene</th>
<th>Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixer 1</td>
<td>2014</td>
<td>None</td>
<td>Fugitive</td>
<td>Vinyl Compounding</td>
<td>4,742,020.91</td>
<td>0.002</td>
<td>2.40%</td>
<td>0.01%</td>
<td>1.16%</td>
<td>1.19%</td>
<td>0.04%</td>
<td>4.74</td>
</tr>
<tr>
<td>Mixer 2</td>
<td>2014</td>
<td>None</td>
<td>Fugitive</td>
<td>Vinyl Compounding</td>
<td>0.000</td>
<td>0.01</td>
<td>1.16%</td>
<td>1.19%</td>
<td>0.04%</td>
<td>0.01%</td>
<td>0.01%</td>
<td>0.01</td>
</tr>
<tr>
<td>Mixer 3</td>
<td>1985</td>
<td>None</td>
<td>Fugitive</td>
<td>Vinyl Compounding</td>
<td>0.000</td>
<td>0.01</td>
<td>1.16%</td>
<td>1.19%</td>
<td>0.04%</td>
<td>0.01%</td>
<td>0.01%</td>
<td>0.01</td>
</tr>
<tr>
<td>Mixer 4</td>
<td>1981</td>
<td>None</td>
<td>Fugitive</td>
<td>Vinyl Compounding</td>
<td>0.000</td>
<td>0.01</td>
<td>1.16%</td>
<td>1.19%</td>
<td>0.04%</td>
<td>0.01%</td>
<td>0.01%</td>
<td>0.01</td>
</tr>
<tr>
<td>Mixer 5</td>
<td>2002</td>
<td>None</td>
<td>Fugitive</td>
<td>Vinyl Compounding</td>
<td>0.000</td>
<td>0.01</td>
<td>1.16%</td>
<td>1.19%</td>
<td>0.04%</td>
<td>0.01%</td>
<td>0.01%</td>
<td>0.01</td>
</tr>
<tr>
<td>Mixer 6</td>
<td>2001</td>
<td>None</td>
<td>Fugitive</td>
<td>Vinyl Compounding</td>
<td>0.000</td>
<td>0.01</td>
<td>1.16%</td>
<td>1.19%</td>
<td>0.04%</td>
<td>0.01%</td>
<td>0.01%</td>
<td>0.01</td>
</tr>
<tr>
<td>Mixer 7</td>
<td>2003</td>
<td>None</td>
<td>Fugitive</td>
<td>Base Compounding</td>
<td>4,767,490.08</td>
<td>0.0002</td>
<td>2.40%</td>
<td>0.01%</td>
<td>1.16%</td>
<td>1.19%</td>
<td>0.04%</td>
<td>9.48</td>
</tr>
<tr>
<td>New Mixer 7</td>
<td>2019</td>
<td>None</td>
<td>Fugitive</td>
<td>Base Compounding</td>
<td>4,767,490.08</td>
<td>0.0002</td>
<td>2.40%</td>
<td>0.01%</td>
<td>1.16%</td>
<td>1.19%</td>
<td>0.04%</td>
<td>9.47</td>
</tr>
<tr>
<td>Drum Wash</td>
<td>1995</td>
<td>None</td>
<td>Fugitive</td>
<td>Drum Wash</td>
<td>105,897.69</td>
<td>0.04</td>
<td>0.0096%</td>
<td>0.0000%</td>
<td>0.0010%</td>
<td>0.0011%</td>
<td>0.0000%</td>
<td>4.12E-04</td>
</tr>
<tr>
<td>Churn Wash</td>
<td>1995</td>
<td>None</td>
<td>Fugitive</td>
<td>Churn Wash</td>
<td>310,863.78</td>
<td>0.04</td>
<td>0.0096%</td>
<td>0.0000%</td>
<td>0.0010%</td>
<td>0.0011%</td>
<td>0.0000%</td>
<td>6.22E-04</td>
</tr>
</tbody>
</table>

Note:
Emission factor is a site specific factor based on a weight-loss study.
% HAP information is based on representative worst case coating x % HAP containing material in unit
Since Mixer 8 and New Mixer 7 are identically sized, the potential throughput of the Base Compounding process (9,534,980.15 lb/yr) has been split in order to show the PTE of New Mixer 7 for the modification.

Methodology
\[
\text{VOC Emissions (tons/yr)} = \text{Potential Throughput (lb/yr)} \times \text{Emission Factor (lb VOC/lb)} \times 1 \text{ ton/2000 lbs}
\]
\[
\text{HAP Emissions (tons/yr)} = \text{VOC Emissions (tons/yr)} \times \text{wt% HAP}
\]
## Appendix A: Emissions Calculations

### Natural Gas Combustion Only - Space Heating

#### Company Name: Avery Dennison MFD
Address City IN Zip: 270 Westmeadow Place, Lowell, IN 46356

**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Heating type</th>
<th>Stack ID or Fugitive</th>
<th>Construction Date</th>
<th>Direct/Indirect</th>
<th>Heat Input (MMBTU/hr)</th>
<th>Capacity (MMCF/yr)</th>
<th>Total Potential Throughput (MMCF/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>HVAC1B</td>
<td>General Room Heating</td>
<td>Fugitive</td>
<td>5/25/1993</td>
<td>Direct</td>
<td>1.296</td>
<td>11.1</td>
<td>12.0</td>
</tr>
<tr>
<td>HVAC3B</td>
<td>General Room Heating</td>
<td>Fugitive</td>
<td>5/25/1993</td>
<td>Direct</td>
<td>1.296</td>
<td>11.1</td>
<td>12.0</td>
</tr>
<tr>
<td>HVAC4B</td>
<td>General Room Heating</td>
<td>Fugitive</td>
<td>5/25/1993</td>
<td>Direct</td>
<td>1.296</td>
<td>11.1</td>
<td>12.0</td>
</tr>
<tr>
<td>HVAC5</td>
<td>General Room Heating</td>
<td>Fugitive</td>
<td>12/1/2002</td>
<td>Indirect</td>
<td>0.15</td>
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<td>1.5</td>
</tr>
<tr>
<td>HVAC6</td>
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<td>Fugitive</td>
<td>12/1/2003</td>
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<td>0.096</td>
<td>0.8</td>
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<tr>
<td>HVAC7</td>
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<td>2/24/2006</td>
<td>Indirect</td>
<td>0.39</td>
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<td>HVAC8</td>
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<td>11/1/2005</td>
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<td>2.1</td>
</tr>
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<td>HVAC9</td>
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<td>1984</td>
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<td>5/1/2009</td>
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<td>0.18</td>
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<td>7/1/2004</td>
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<td>HVAC18</td>
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<td>1983</td>
<td>Indirect</td>
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<td>0.6</td>
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<td>4.1</td>
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<td>4.0</td>
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<td>HVAC48</td>
<td>General Room Heating</td>
<td>Indirect</td>
<td>2009</td>
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<td>2019</td>
<td>1.5</td>
<td>12.9</td>
<td>12.9</td>
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**Totals:**
- Heat Input Capacity (MMBTU/hr): 12.038
- Potential Throughput (MMCF/yr): 103.4

### Emissions Factors

#### Pollutant Emission Factors

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
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</table>

**Notes:**
- PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
- PM2.5 emission factor is filterable and condensable PM2.5 combined.
- Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

#### Potential Emission in tons/yr

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Total PM*</th>
<th>Total PM10*</th>
<th>Total PM2.5*</th>
<th>Total SO2</th>
<th>Total NOx</th>
<th>Total VOC</th>
<th>Total CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission (tons/yr)</td>
<td>0.10</td>
<td>0.39</td>
<td>0.39</td>
<td>0.03</td>
<td>5.17</td>
<td>0.28</td>
<td>4.34</td>
</tr>
</tbody>
</table>

**PTE of HVAC49 in tons/yr**
- PM*: 0.01
- PM10*: 0.05
- PM2.5*: 0.05
- SO2: 0.00
- NOx: 0.64
- VOC: 0.03
- CO: 0.54

### Methodology

- All emission factors are based on normal firing.
- MMBtu = 1,000,000 Btu
- MMCF = 1,000,000 Cubic Feet of Gas
- Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
- Potential Throughput (MMCF) = Heat Input Capacity (MMBTU/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
- Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

### Hazardous Air Pollutants (HAPs)

#### Organics Emission Factors

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.1E-04</td>
<td>6.2E-05</td>
<td>3.9E-03</td>
<td>0.09</td>
<td>1.8E-04</td>
<td></td>
</tr>
</tbody>
</table>

**PTE of HVAC49 in tons/yr**
- Benzene: 1.4E-05
- Dichlorobenzene: 7.7E-06
- Formaldehyde: 4.8E-04
- Hexane: 0.01
- Toluene: 2.2E-05

### Metals Emission Factors

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.6E-05</td>
<td>5.7E-05</td>
<td>7.2E-05</td>
<td>2.0E-05</td>
<td>1.1E-04</td>
<td></td>
</tr>
</tbody>
</table>

**PTE of HVAC49 in tons/yr**
- Lead: 3.2E-06
- Cadmium: 7.1E-06
- Chromium: 9.0E-06
- Manganese: 2.4E-06
- Nickel: 1.4E-05

Methodology is the same as above.

Total HAPs: 0.10
Total HAPs for HVAC49: 1.216E-02

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
# Appendix A: Emissions Calculations

## Solvent coating (L-1, L-2, L-3) - VOC

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

### Unlimited Potential to Emit (PTE)

| Emission Unit | Emission Unit ID | Material | Density (lb/gal) | Weight % Volatile (Water & Organics) | Weight % Water | Weight % VOC | Volume % Water | Volume % Solids | Usage rate (gal/unit) | Maximum throughput (ft²/hr) | Maximum usage (gal/day) | VOC content (lb/gal coating) | VOC content (lb/gal coating less water) | VOC content (lb/gal coating solids) | PTE of VOC (lb/hr) | PTE of VOC (lb/day) | PTE of VOC (ton/yr) | Limited PTE of VOC (ton/yr) |
|---------------|-----------------|----------|-----------------|--------------------------------------|---------------|-------------|---------------|----------------|---------------------|--------------------------|------------------------|----------------------------|-------------------------------|---------------------------------|------------------------|-----------------|-----------------|-----------------|-------------------|
| Roll Coating Line | L-1             | Representative Coating based on product mix | 10.27 | 32.5% | 0.0% | 32.5% | 0.0% | 47.5% | 0.00300 | 25,313 | 1822.54 | 3.34 | 3.34 | 7.03 | 253.47 | 6083.17 | 1110.18 |
| Roll Coating Line | L-2             | Representative Coating based on product mix | 10.08 | 39.3% | 0.0% | 39.3% | 0.0% | 42.6% | 0.00300 | 46,688 | 3361.54 | 3.96 | 3.96 | 9.29 | 554.15 | 13299.58 | 2427.17 |
| Coating Head* | CH-1            | Clear barrier coat (P79-71) | 7.10 | 87.9% | 0.0% | 87.9% | 0.0% | 9.7% | 0.00173 | 46,688 | 1938.49 | 6.24 | 6.24 | 64.33 | 504.00 | 12095.92 | 2207.51 |
| Roll Coating Line | L-3             | Representative Coating | 9.96 | 32.4% | 0.0% | 32.4% | 0.0% | 50.0% | 0.00300 | 46,688 | 3361.54 | 3.22 | 3.22 | 6.46 | 451.64 | 10839.44 | 1978.20 |

**Total:** 1763.3 42318.1 7723.1

**VOC Product Mix Factor:** 1.25  
**Volume Solids Product Mix Factor:** 0.75

**Notes:**

With Renewal T089-39324-00407, the line speed (maximum throughput) in ft²/hr of each coating line (L-1, L-2 plus CH-1, L-3) has been corrected to that of the coaters at the request of the source.  
With Renewal T089-42985-00407, the calculations are derived from additional information provided by the source on May 24, 2018 and represents the worse case VOC defined as a representative composite of current coating mixes with a safety factor included to allow for variances in future products.

*Coating Head (CH-1) is installed on Roll Coating Line (L-2).

**Methodology:**

- Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or provided in SDS  
- Weight % Volatile (Water & Organics) = Weight % VOC + Weight % Water  
- Volume % Solids = 1 - Volume % Volatile or provided in SDS  
- Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day  
- VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC  
- VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)  
- VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids  
- PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)  
- PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day  
- PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs

### Controlled Potential to Emit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Control efficiency (%)</th>
<th>Controlled PTE of VOC (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roll Coating Line</td>
<td>L-1</td>
<td>99.3%</td>
<td>7.77</td>
</tr>
<tr>
<td>Roll Coating Line</td>
<td>L-2</td>
<td>99.3%</td>
<td>58.59</td>
</tr>
<tr>
<td>Coating Head*</td>
<td>CH-1</td>
<td>99.3%</td>
<td>3.50</td>
</tr>
<tr>
<td>Roll Coating Line</td>
<td>L-3</td>
<td>99.3%</td>
<td>13.85</td>
</tr>
</tbody>
</table>

**Total:** 122.17

**Note:**  
Control efficiency of the thermal oxidizer (99.3%) is from latest stack test performed on July 10, 2014.

**Methodology:**

Controlled PTE of VOC (ton/yr) = Unlimited PTE of VOC (ton/yr) * (1 - Control efficiency)
## Appendix A: Emissions Calculations

### Solvent coating (L-1, L-2, L-3) - HAPs

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

#### Unlimited Potential to Emit (PTE)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Usage rate (gal/ft²)</th>
<th>Maximum throughput (ft²/hr)</th>
<th>% Weight</th>
<th>PTE (ton/yr)</th>
<th>% Weight</th>
<th>PTE (ton/yr)</th>
<th>% Weight</th>
<th>PTE (ton/yr)</th>
<th>% Weight</th>
<th>PTE (ton/yr)</th>
<th>PTE (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roll Coating Line</td>
<td>L-1</td>
<td>Representative Coating based on product mix</td>
<td>10.27</td>
<td>0.00300</td>
<td>25,313</td>
<td>0%</td>
<td>0.00</td>
<td>1.04%</td>
<td>35.44</td>
<td>1.08%</td>
<td>36.72</td>
<td>0.04%</td>
<td>1.28</td>
<td>73.44</td>
</tr>
<tr>
<td>Roll Coating Line</td>
<td>L-2</td>
<td>Representative Coating based on product mix</td>
<td>10.08</td>
<td>0.00300</td>
<td>46,688</td>
<td>0%</td>
<td>0.00</td>
<td>1.16%</td>
<td>71.89</td>
<td>1.19%</td>
<td>73.43</td>
<td>0.00%</td>
<td>0.00</td>
<td>145.32</td>
</tr>
<tr>
<td>Coating Head**</td>
<td>CH-1</td>
<td>Clear barrier coat (979-71)</td>
<td>7.10</td>
<td>0.00173</td>
<td>46,688</td>
<td>20%</td>
<td>502.28</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00%</td>
<td>502.28</td>
<td>502.28</td>
</tr>
<tr>
<td>Roll Coating Line</td>
<td>L-3</td>
<td>Representative Coating based on product mix</td>
<td>9.96</td>
<td>0.00300</td>
<td>46,688</td>
<td>0.45%</td>
<td>27.50</td>
<td>0.90%</td>
<td>54.99</td>
<td>1.04%</td>
<td>63.39</td>
<td>0.01%</td>
<td>0.76</td>
<td>146.65</td>
</tr>
</tbody>
</table>

**Total:** 529.8 - 162.3 - 173.5 - 2.0 = 867.7

#### Notes:

With Renewal T089-39324-00407, the linespeed (maximum throughput) in ft²/hr of each coating line (L-1, L-2 plus CH-1, L-3) has been corrected to that of the coaters at the request of the source. With Renewal T089-39324-00407, the calculations are derived from additional information provided by the source on May 24, 2018 and represents the worse case HAPs defined as a representative composite of current coating mixes with a safety factor included to allow for variances in future products.

* With Renewal T089-39324-00407, the single worst case HAP PTE (tons/yr) for each coating line represents the highest PTE (tons/yr) possible for any single HAP emitted on that coating line.

** Coating Head (CH-1) is installed on Roll Coating Line (L-2).

#### Methodology:

PTE of HAP (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

### Controlled Potential to Emit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Control efficiency (%)</th>
<th>Controlled PTE of Toluene (ton/yr)</th>
<th>Controlled PTE of Xylene (ton/yr)</th>
<th>Controlled PTE of Cumene (ton/yr)</th>
<th>Controlled PTE of Ethylbenzene (ton/yr)</th>
<th>Controlled PTE of Total HAPs (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roll Coating Line</td>
<td>L-1</td>
<td>99.3%</td>
<td>-</td>
<td>0.25</td>
<td>0.26</td>
<td>0.01</td>
<td>0.51</td>
</tr>
<tr>
<td>Roll Coating Line</td>
<td>L-2</td>
<td>99.3%</td>
<td>-</td>
<td>0.50</td>
<td>0.51</td>
<td>-</td>
<td>1.02</td>
</tr>
<tr>
<td>Coating Head**</td>
<td>CH-1</td>
<td>99.3%</td>
<td>3.52</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>3.52</td>
</tr>
<tr>
<td>Roll Coating Line</td>
<td>L-3</td>
<td>99.3%</td>
<td>0.19</td>
<td>0.38</td>
<td>0.44</td>
<td>0.01</td>
<td>1.03</td>
</tr>
</tbody>
</table>

**Total:** 3.71 1.14 1.21 0.01 = 6.07

#### Notes:

Control efficiency of the thermal oxidizer (99.3%) is from latest stack test performed on July 10, 2014.

#### Methodology:

Controlled PTE of HAPs (ton/yr) = Unlimited PTE of HAPs (ton/yr) * (1 - Control efficiency (99.3%))
## Appendix A: Emissions Calculations

### Solvent coating (L-1, L-2, L-3) - HAPs

Correct 2013 PTE

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

### Unlimited Potential to Emit (PTE)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Usage rate (gal/ft²)</th>
<th>Maximum throughput (ft²/hr)</th>
<th>Toluene % Weight</th>
<th>PTE (ton/yr)</th>
<th>Xylene % Weight</th>
<th>PTE (ton/yr)</th>
<th>Cumene % Weight</th>
<th>PTE (ton/yr)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roll Coating Line L-1</td>
<td>L-1</td>
<td>FAS-8178</td>
<td>9.34</td>
<td>0.00300</td>
<td>25,313</td>
<td>0%</td>
<td>0.00</td>
<td>1.35%</td>
<td>41.94</td>
<td>1.86%</td>
<td>57.78</td>
<td>99.72</td>
</tr>
<tr>
<td>Roll Coating Line L-2</td>
<td>L-2</td>
<td>FAS-8178</td>
<td>9.34</td>
<td>0.00300</td>
<td>46,688</td>
<td>0%</td>
<td>0.00</td>
<td>1.35%</td>
<td>77.35</td>
<td>1.86%</td>
<td>106.58</td>
<td>183.93</td>
</tr>
<tr>
<td>Coating Head* CH-1</td>
<td></td>
<td>Clear barrier coat</td>
<td>7.10</td>
<td>0.00173</td>
<td>46,688</td>
<td>30%</td>
<td>753.41</td>
<td>0%</td>
<td>0.00</td>
<td>0%</td>
<td>0.00</td>
<td>753.41</td>
</tr>
<tr>
<td>Roll Coating Line L-3</td>
<td>L-3</td>
<td>FAS-8178</td>
<td>9.34</td>
<td>0.00300</td>
<td>46,688</td>
<td>0%</td>
<td>0.00</td>
<td>1.35%</td>
<td>77.35</td>
<td>1.86%</td>
<td>106.58</td>
<td>183.93</td>
</tr>
</tbody>
</table>

**Total:** 753.4 - 196.6 - 270.9 1221.0

**Notes:**

These calculations are derived on additional information provided by the source on May 24, 2018 and represents the corrected worse case HAPs as of the 2013 renewal. They are listed here for reference only.

With Renewal T089-39324-00407, the linespeed (maximum throughput) in ft²/hr of each coating line (L-1, L-2 plus CH-1, L-3) has been corrected to that of the coaters at the request of the source.

*Coating Head (CH-1) is installed on Roll Coating Line (L-2).

### Methodology:

\[
PTE_{\text{of HAP}} (\text{ton/yr}) = \text{Usage rate (gal/unit)} \times \text{Maximum throughput (unit/hr)} \times \text{Density (lb/gal)} \times \text{Weight % HAP} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs}
\]

### Controlled Potential to Emit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Control efficiency (%)</th>
<th>Controlled PTE of Toluene (ton/yr)</th>
<th>Controlled PTE of Xylene (ton/yr)</th>
<th>Controlled PTE of Cumene (ton/yr)</th>
<th>Controlled PTE of Total HAPs (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roll Coating Line L-1</td>
<td>L-1</td>
<td>99.3%</td>
<td>-</td>
<td>0.29</td>
<td>0.40</td>
<td>0.70</td>
</tr>
<tr>
<td>Roll Coating Line L-2</td>
<td>L-2</td>
<td>99.3%</td>
<td>-</td>
<td>0.54</td>
<td>0.75</td>
<td>1.29</td>
</tr>
<tr>
<td>Coating Head* CH-1</td>
<td></td>
<td>99.3%</td>
<td>5.27</td>
<td>-</td>
<td>-</td>
<td>5.27</td>
</tr>
<tr>
<td>Roll Coating Line L-3</td>
<td>L-3</td>
<td>99.3%</td>
<td>-</td>
<td>0.54</td>
<td>0.75</td>
<td>1.29</td>
</tr>
</tbody>
</table>

**Total:** 6.65 3.27 10.44 8.55

**Note:**

Control efficiency of the thermal oxidizer (99.3%) is from latest stack test performed on July 10, 2014.

### Methodology:

Controlled PTE of HAPs (ton/yr) = Unlimited PTE of HAPs (ton/yr) \times (1 - Control efficiency (98.4%))
## Unlimited Potential to Emit (PTE)

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (Water &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % VOC</th>
<th>Volume % Water</th>
<th>Usage rate (g/m²)</th>
<th>Usage rate (lb/ft²)</th>
<th>Maximum throughput (ft²/hr)</th>
<th>Maximum usage (gal/day)</th>
<th>VOC content (lb/gal coating)</th>
<th>VOC content (lb/gal coating less water)</th>
<th>VOC content (lb/gal coating solids)</th>
<th>PTE of VOC (lb/hr)</th>
<th>PTE of VOC (lb/day)</th>
<th>PTE of VOC (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ruby Layer 1</td>
<td>Ruby Coat</td>
<td>12.30</td>
<td>45.1%</td>
<td>45.0%</td>
<td>0.1148%</td>
<td>66.4%</td>
<td>101.5</td>
<td>0.0208</td>
<td>46.688</td>
<td>1890.55</td>
<td>0.014</td>
<td>0.042</td>
<td>1.11</td>
<td>26.70</td>
<td>2.44</td>
<td></td>
</tr>
<tr>
<td>Ruby Layer 2</td>
<td></td>
<td>8.40</td>
<td>50.0%</td>
<td>50.0%</td>
<td>0.0291%</td>
<td>50.4%</td>
<td>86.4</td>
<td>0.0177</td>
<td>46.688</td>
<td>2356.47</td>
<td>0.002</td>
<td>0.005</td>
<td>0.24</td>
<td>5.76</td>
<td>0.53</td>
<td></td>
</tr>
<tr>
<td>Total for each line:</td>
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<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Diamond Layer 1</td>
<td>Diamond Coat</td>
<td>8.76</td>
<td>57.6%</td>
<td>57.0%</td>
<td>0.63%</td>
<td>59.9%</td>
<td>56.7</td>
<td>0.0116</td>
<td>46.688</td>
<td>1482.88</td>
<td>0.06</td>
<td>0.14</td>
<td>3.41</td>
<td>81.84</td>
<td>7.47</td>
<td></td>
</tr>
<tr>
<td>Diamond Layer 2</td>
<td></td>
<td>8.59</td>
<td>61.2%</td>
<td>60.0%</td>
<td>1.15%</td>
<td>61.8%</td>
<td>50.3</td>
<td>0.0103</td>
<td>46.688</td>
<td>1341.50</td>
<td>0.10</td>
<td>0.26</td>
<td>5.52</td>
<td>132.52</td>
<td>12.09</td>
<td></td>
</tr>
<tr>
<td>Total for each line:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Notes:
- These calculations are derived from the modification application received by OAQ on October 26, 2010 and MSDSs submitted by the source on May 10, 2013.
- With Renewal T089-39324-00407, emulsion coating is added to Coating Line L-1 at the request of the source.
- Each emulsion coat requires both layers to be applied and only one layer can be applied at a time. Therefore, potential emissions are calculated at 4380 hrs/yr for each layer.
- The coating head (CH-1) is not used with the emulsion coatings.
- The emissions from the emulsion are not included in the source-wide PTE because using the solvent coatings is the worst-case scenario.
- The emulsions coatings can comply with the 326 IAC 8-2-11 emission limit of 4.8 pounds per gallon of coating, excluding water, without using VOC control.

### Methodology:
- Weight % Volatile (Water & Organics) = Weight % VOC + Weight % Water
- Usage rate (lb/ft²) = Usage rate (g/m²) / 0.0022 m²/ft² / 10.76 g/lb
- Maximum usage (gal/day) = Maximum throughput (ft²/hr) * Usage rate (lb/ft²) / Density (lb/gal) / 24 hrs/day
- VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
- VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1 - Volume % Water)
- VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
- PTE of VOC (lb/hr) = Maximum throughput (ft²/hr) * Usage rate (lb/ft²) * Weight % VOC
- PTE of VOC (lb/day) = Maximum throughput (ft²/hr) * Usage rate (lb/ft²) * Weight % VOC * 24 hrs/day
- PTE of VOC (ton/yr) = Maximum throughput (ft²/hr) * Usage rate (lb/ft²) * Weight % VOC * 8760 hrs/yr * 1 ton/2000 lbs
## Appendix A: Emissions Calculations
Emulsion coating (L-1, L-2, L-3) - HAPs

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Material</th>
<th>Usage rate (gal/ft²)</th>
<th>Maximum throughput (ft²/hr)</th>
<th>Triethylamine % Weight</th>
<th>PTE (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roll Coating Lines</td>
<td>L-1, L-2 &amp; L-3</td>
<td>Ruby Coat</td>
<td>0.0208</td>
<td>46,688</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ruby Layer 1</td>
<td>0.0177</td>
<td>46,688</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Diamond Coat</td>
<td>0.0116</td>
<td>46,688</td>
<td>2%</td>
<td>47.41</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Diamond Layer 1</td>
<td>0.0103</td>
<td>46,688</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

**Notes:**
These calculations are derived from the modification application received by OAQ on October 26, 2010 and MSDSs submitted by the source on May 10, 2013.  
With Renewal T089-39324-00407, emulsion coating is added to Coating Line L-1 at the request of the source.  
With Renewal T089-39324-00407, the linespeed (maximum throughput) in ft²/hr of each coating line (L-1, L-2 plus CH-1, L-3) has been corrected to that of the coaters at the request of the source.  
The emissions from the emulsion are not included in the source-wide PTE because using the solvent coatings is the worst-case scenario.

**Methodology:**
PTE of HAP (ton/yr) = Usage rate (lb/ft²) * Maximum throughput (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Appendix A: Emissions Calculations
Natural Gas Combustion Only
Process Heating TO and Ovens

Company Name: Avery Dennison MFD
Address City IN Zip: 270 Westmeadow Place, Lowell, IN 46356
Permit Number: T089-42985-00407
Reviewer: Olajumoke Kayode

<table>
<thead>
<tr>
<th>Emission unit</th>
<th>Emission Unit ID</th>
<th>Number of Units</th>
<th>Heat Input Capacity Each (MMBtu/hr/unit)</th>
<th>Total Potential Throughput (MMCF/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thermal oxidizer*</td>
<td>C-1</td>
<td>1</td>
<td>28.46</td>
<td>244.4</td>
</tr>
<tr>
<td>Three-zone oven**</td>
<td>L-1 oven</td>
<td>1</td>
<td>4.00</td>
<td>34.4</td>
</tr>
<tr>
<td>Three-zone oven**</td>
<td>L-2 oven</td>
<td>1</td>
<td>5.60</td>
<td>48.1</td>
</tr>
<tr>
<td>Three-zone oven**</td>
<td>L-3 oven</td>
<td>1</td>
<td>5.60</td>
<td>48.1</td>
</tr>
<tr>
<td><strong>Totals (with thermal oxidizer C-1 as worst-case):</strong></td>
<td></td>
<td></td>
<td>43.66</td>
<td>374.96</td>
</tr>
</tbody>
</table>

*Consists of: two (2) burners rated at 3.2 MMBtu/hr, two (2) injectors rated at 2.5 MMBtu/hr, and one (1) 17.06 MMBtu/hr hot oil burner
This is the same unit as the 20.0 MMBtu/hr thermal oxidizer added in TV AA #089-25268-00407. Capacity was correct in the second renewal.
**The three (3) natural gas-fired ovens existed at the source since its construction but were not included in previous emission unit descriptions.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM$_{10}$*</th>
<th>Direct PM$_{2.5}$*</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMCF)</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100.0</td>
<td>5.5</td>
<td>84.0</td>
</tr>
<tr>
<td>Potential Emission (tons/yr)</td>
<td>0.4</td>
<td>1.4</td>
<td>1.42</td>
<td>0.1</td>
<td>18.7</td>
<td>1.0</td>
<td>15.7</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM$_{10}$ emission factor is filterable and condensable PM$_{10}$ combined. PM$_{2.5}$ emission factor is filterable and condensable PM2.5 combined.

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMCF)</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMCF)</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
</tr>
<tr>
<td>Potential Emission (tons/yr)</td>
<td>9.374E-05</td>
<td>2.062E-04</td>
<td>2.625E-04</td>
<td>7.124E-05</td>
<td>3.937E-04</td>
</tr>
</tbody>
</table>

Total HAPs: 3.538E-01
Single HAP: 3.375E-01

Notes:
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology:
Total Heat Input Capacity (MMBtu/hr) = Σ (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)
Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)
Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs
Appendix A: Emission Calculations
Natural Gas Emergency Generator

Company Name: Avery Dennison MFD
Address City IN Zip: 270 Westmeadow Place, Lowell, IN 46356
Permit Number: T089-42895-00407
Reviewer: Olajumoke Kayode

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMBtu)</td>
<td>9.50E-03</td>
<td>1.94E-02</td>
<td>1.94E-02</td>
<td>5.88E-04</td>
<td>2.21E+00</td>
<td>2.96E-02</td>
<td>3.72E+00</td>
</tr>
<tr>
<td>Potential Emissions (tons/yr)</td>
<td>0.0004</td>
<td>0.0009</td>
<td>0.0009</td>
<td>0.00003</td>
<td>0.010</td>
<td>0.001</td>
<td>0.17</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Acetaldehyde</th>
<th>Acrolein</th>
<th>Benzene</th>
<th>1,3-Butadiene</th>
<th>Formaldehyde</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMBtu)</td>
<td>2.79E-03</td>
<td>2.63E-03</td>
<td>1.58E-03</td>
<td>6.63E-04</td>
<td>2.05E-02</td>
</tr>
<tr>
<td>Potential Emissions (tons/yr)</td>
<td>1.31E-04</td>
<td>1.23E-04</td>
<td>7.41E-05</td>
<td>3.11E-05</td>
<td>9.61E-04</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Methanol</th>
<th>Total PAH**</th>
<th>Toluene</th>
<th>Xylene</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMBtu)</td>
<td>3.08E-03</td>
<td>1.94E-04</td>
<td>5.88E-04</td>
<td>1.95E-04</td>
</tr>
<tr>
<td>Potential Emissions (tons/yr)</td>
<td>1.43E-04</td>
<td>6.61E-06</td>
<td>2.62E-05</td>
<td>9.14E-06</td>
</tr>
</tbody>
</table>

**PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

Notes:
- MMBtu = 1,000,000 Btu
- MMCF = 1,000,000 Cubic Feet of Gas
- Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-3
- HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-3.

Methodology
- Potential Fuel Usage (MMBtu/yr) = Maximum Output Horsepower Rating (hp) * Brake Specific Fuel Consumption (Btu/hp-hr) * Maximum Hours Operated per Year (hr/yr) / 1000000 Btu/MMBtu
- Potential Fuel Usage (MMCF/yr) = Potential Fuel Usage (MMBtu/yr) / High Heat Value (MMBtu/MMCF)
Appendix A: Emission Calculations
Diesel Emergency Generator

Company Name: Avery Dennison MFD
Address City IN Zip: 270 Westmeadow Place, Lowell, IN 46356
Permit Number: T089-42985-00407
Reviewer: Olajumoke Kayode

<table>
<thead>
<tr>
<th>Output Horsepower Rating (hp)</th>
<th>500.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Hours Operated per Year (hr/yr)</td>
<td>500</td>
</tr>
<tr>
<td>Potential Throughput (hp-hr/yr)</td>
<td>250,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM_{10}*</th>
<th>direct PM_{2.5}*</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/hp-hr)</td>
<td>0.0022</td>
<td>0.0022</td>
<td>0.0022</td>
<td>0.0021</td>
<td>0.0310</td>
<td>0.0025</td>
<td>0.0067</td>
</tr>
<tr>
<td>Potential Emission (tons/yr)</td>
<td>0.28</td>
<td>0.28</td>
<td>0.28</td>
<td>0.26</td>
<td>3.88</td>
<td>0.31</td>
<td>0.84</td>
</tr>
</tbody>
</table>

*PM and PM_{2.5} emission factors are assumed to be equivalent to PM_{10} emission factors.

No information was given regarding which method was used to determine the factor or the fraction of PM_{10} which is condensable.

### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Toluene</th>
<th>Xylene</th>
<th>1,3-Butadiene</th>
<th>Formaldehyde</th>
<th>Acetaldehyde</th>
<th>Acrolein</th>
<th>Total PAH***</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/hp-hr)</td>
<td>6.53E-06</td>
<td>2.86E-06</td>
<td>2.00E-06</td>
<td>2.74E-07</td>
<td>8.26E-06</td>
<td>5.37E-06</td>
<td>6.48E-07</td>
<td>1.18E-06</td>
</tr>
<tr>
<td>Potential Emission (tons/yr)</td>
<td>8.16E-04</td>
<td>3.58E-04</td>
<td>2.49E-04</td>
<td>3.42E-05</td>
<td>1.03E-03</td>
<td>6.71E-04</td>
<td>8.09E-05</td>
<td>1.47E-04</td>
</tr>
</tbody>
</table>

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

**Total HAPs:** 3.39E-03
**Single HAP:** 1.03E-03 - Formaldehyde

**Notes:**

- MMBtu = 1,000,000 Btu
- MMCF = 1,000,000 Cubic Feet of Gas
- Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).
- Emission Factors are from AP-42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2

**Methodology**

Potential Throughput (hp-hr/yr) = Output Horsepower Rating (hp) * Maximum Hours Operated per Year
Potential Emission (tons/yr) = Potential Throughput (hp-hr/yr) * Emission Factor (lb/hp-hr) / 2,000 lb/ton
## Insignificant Degreasing Activities

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

<table>
<thead>
<tr>
<th>Product</th>
<th>Max usage (gal/yr)</th>
<th>Density (lb/gal)</th>
<th>Weight % VOC</th>
<th>PTE of VOC (ton/yr)</th>
<th>Weight %</th>
<th>PTE (ton/yr)</th>
<th>Weight %</th>
<th>PTE (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety Klean</td>
<td>145</td>
<td>6.700</td>
<td>100%</td>
<td><strong>0.49</strong></td>
<td>0.1%</td>
<td><strong>0.0005</strong></td>
<td>0.2%</td>
<td><strong>0.0010</strong></td>
</tr>
</tbody>
</table>

**Total HAPs:** 0.0015

**Notes:**
Degreaser is up to 100% hydrotreated light distillate (CAS No.: 64742-47-8), which is 0.1% toluene

**Methodology:**

PTE of VOC (ton/yr) = Max usage (gal/yr) * Density (lb/gal) * Weight % VOC * 1 ton/2000 lbs.

PTE of HAPs (ton/yr) = Max usage (gal/yr) * Density (lb/gal) * Weight % HAPs * 1 ton/2000 lbs.
## Appendix A: Emissions Calculations
### Dry Compounding

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

<table>
<thead>
<tr>
<th>Maximum throughput</th>
<th>Emission factors (lb/ton)</th>
<th>Uncontrolled PTE (lb/hr)</th>
<th>Uncontrolled PTE (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(lb/hr)</td>
<td>(lb/yr)</td>
<td>PM</td>
<td>PM</td>
</tr>
<tr>
<td>213.35</td>
<td>1,868,960</td>
<td>0.0069 PM</td>
<td>0.00074 PM</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.0033 PM _10 &amp; PM _2.5</td>
<td>0.00035 PM _10 &amp; PM _2.5</td>
</tr>
</tbody>
</table>

**Notes:**

This unit was added into the permit as an insignificant unit in the second renewal (T089-32905-00407). The maximum throughput is 1,868,960 pounds per year, as provided by the source. Emission factor is from AP-42, Table 11.12-2 for concrete batching, as the dry material mixed is similar in size to concrete. This process is controlled by a 1,600 cfm dust collector.

**Methodology:**

Maximum throughput (lb/hr) = Maximum throughput (lb/yr) / 8760 hr/yr  
Uncontrolled PTE (lb/hr) = Maximum throughput (lb/hr) * 1 ton/2000 lbs * Emission factor (lb/ton)  
### Insignificant Solvent Recycling Distillation

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

#### Emissions Calculations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Stack ID or Fugitive</th>
<th>Construction Date</th>
<th>Control Device</th>
<th>Maximum Capacity (gal)</th>
<th>Potential Throughput (lbs/yr)</th>
<th>Emission Factor (lb VOC/ton)</th>
<th>Wt% Total HAP</th>
<th>wt% Toluene</th>
<th>wt% Xylene</th>
<th>wt% Cumene</th>
<th>wt% Ethyl Benzene</th>
<th>Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Condenser Vent</td>
<td>Fugitive</td>
<td>1995</td>
<td>None</td>
<td>72</td>
<td>775,926.75</td>
<td>3.3</td>
<td>0.00194%</td>
<td>0.00%</td>
<td>0.00087%</td>
<td>0.00093%</td>
<td>0.00001%</td>
<td>1.2434E-05</td>
</tr>
<tr>
<td>Condenser Fugitive</td>
<td>Fugitive</td>
<td></td>
<td></td>
<td></td>
<td>775,926.75</td>
<td>0.2</td>
<td>0.00194%</td>
<td>0.00%</td>
<td>0.00087%</td>
<td>0.00093%</td>
<td>0.00001%</td>
<td>7.5360E-07</td>
</tr>
<tr>
<td>Distillation Solvent Tank</td>
<td>Fugitive</td>
<td></td>
<td></td>
<td></td>
<td>775,926.75</td>
<td>0.02</td>
<td>0.00194%</td>
<td>0.00%</td>
<td>0.00087%</td>
<td>0.00093%</td>
<td>0.00001%</td>
<td>7.5360E-08</td>
</tr>
<tr>
<td>Still Solvent Tank</td>
<td>Fugitive</td>
<td></td>
<td></td>
<td></td>
<td>593,355.75</td>
<td>0.02</td>
<td>0.00194%</td>
<td>0.00%</td>
<td>0.00087%</td>
<td>0.00093%</td>
<td>0.00001%</td>
<td>5.7628E-08</td>
</tr>
<tr>
<td>Total Distillation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.69</td>
<td>1.33E-05</td>
<td>0.00%</td>
<td>5.98E-06</td>
<td>6.37E-06</td>
<td>9.65E-08</td>
</tr>
</tbody>
</table>

**Note:**  
Condenser vent, Storage tank and Fugitive Emission from Dumping emissions factors taken from AP-42, 4.7 Waste Solvent Reclamation.  
% HAP information is based on representative worst case coating x % HAP containing material in unit.

**Methodology**

\[
\text{VOC Emissions (tons/yr)} = \text{Potential Throughput (lb/yr) x 1 ton/2000 lbs x Emission Factor (lb VOC/lb ton) x 1 ton/2000 lbs}
\]

\[
\text{HAP Emissions (tons/yr)} = \text{VOC Emissions (tons/yr) x wt% HAP}
\]
### Insignificant Storage Tanks

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

#### Emissions Calculations

<table>
<thead>
<tr>
<th>Tank ID</th>
<th>Type of Tank</th>
<th>Contents</th>
<th>Volume (gal)</th>
<th>Throughput (gal/yr)</th>
<th>Standing Loss (lb/yr)</th>
<th>Standing Loss (tpy)</th>
<th>Working Loss (lb/yr)</th>
<th>Working Loss (tpy)</th>
<th>Total Loss (lb/yr)</th>
<th>Total Loss (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>L1 Wash</td>
<td>Vertical Fixed Roof Tank</td>
<td>Ethyl Acetate</td>
<td>105</td>
<td>2,080</td>
<td>0.06</td>
<td>0.0000</td>
<td>0.01</td>
<td>0.0000</td>
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<td>3.813E-05</td>
</tr>
<tr>
<td>L2 Wash</td>
<td>Vertical Fixed Roof Tank</td>
<td>Ethyl Acetate</td>
<td>61</td>
<td>2,080</td>
<td>0.06</td>
<td>0.0000</td>
<td>0.01</td>
<td>0.0000</td>
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<td>3.404E-05</td>
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<td>Vertical Fixed Roof Tank</td>
<td>Ethyl Acetate</td>
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#### Notes:

See Tanks Calculations workbook for calculation methodology.

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<th>L1 Wash Tank</th>
<th>L2 Wash Tank</th>
<th>L3 Wash Tank</th>
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<tr>
<td><strong>Dimensions</strong></td>
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<tr>
<td>Height (in)</td>
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<tr>
<td>Depth (in)</td>
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<tr>
<td>Width (in)</td>
<td>81</td>
<td>72.5</td>
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<tr>
<td><strong>Color</strong></td>
<td>Red with silver lid</td>
<td>Red with silver lid</td>
<td>Red with silver lid</td>
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<tr>
<td><strong>Material Stored</strong></td>
<td>Ethyl Acetate</td>
<td>Ethyl Acetate</td>
<td>Ethyl Acetate</td>
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<tr>
<td><strong>Annual throughput (gal)</strong></td>
<td>2,080.00</td>
<td>2,080.00</td>
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<tr>
<td><strong>Monthly throughput (gal)</strong></td>
<td>173.33</td>
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<tr>
<td><strong>Capacity (gal)</strong></td>
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<tr>
<td><strong>Tank Construction Date</strong></td>
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</table>
# Appendix A: Emission Calculations
## Fugitive Dust Emissions - Paved Roads

**Company Name:** Avery Dennison MFD  
**Address City IN Zip:** 270 Westmeadow Place, Lowell, IN 46356  
**Permit Number:** T089-42985-00407  
**Reviewer:** Olajumoke Kayode

### Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

**Vehicle Information (provided by source)**

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
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</thead>
<tbody>
<tr>
<td>Passenger (entering plant) (one-way trip)</td>
<td>75.0</td>
<td>1.0</td>
<td>75.0</td>
<td>3.0</td>
<td>225.0</td>
<td>900</td>
<td>0.170</td>
<td>12.8</td>
<td>4666.2</td>
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<tr>
<td>Passenger (leaving plant) (one-way trip)</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>40.0</td>
<td>480.0</td>
<td>900</td>
<td>0.170</td>
<td>2.0</td>
<td>746.6</td>
</tr>
<tr>
<td>Commercial (entering plant) (one-way trip)</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>40.0</td>
<td>480.0</td>
<td>900</td>
<td>0.170</td>
<td>2.0</td>
<td>746.6</td>
</tr>
</tbody>
</table>

**Totals**

- 174.0 trips/day
- 1410.0 tons/day
- 29.7 miles/day
- 10825.6 miles/yr

**Average Vehicle Weight Per Trip =**

- 8.1 tons/trip
- Average Miles Per Trip =
  - 0.17 miles/trip

**Unmitigated Emission Factor, \( E \) =**

- \( k \times (sL)^{0.91} \times (W)^{1.02} \) (Equation 1 from AP-42 13.2.1)

- \( k = 0.011 \)  
- \( sL = 9.7 \)  
- \( W = 8.1 \)  

- **PM**  
  - 0.0022  
  - 0.000054  

- **PM10**  
  - 0.0011  

- **PM2.5**  
  - 0.0011  

**PM**  

**PM10**  

**PM2.5**

**Unmitigated Emission Factor, \( E \) =**

- \( k \times (sL)^{0.91} \times (W)^{1.02} \) (Equation 1 from AP-42 13.2.1)

- **PM**  
  - 0.000054  

- **PM10**  
  - 0.0022  

- **PM2.5**  
  - 0.0011

**Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( E_{ext} = E \times \left[1 - \frac{p}{4N}\right] \) (Equation 2 from AP-42 13.2.1)**

- \( p = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
- \( N = 365 \) days per year

**Unmitigated Emission Factor, \( E_{ext} = \)**

- **PM**  
  - 0.00361  

- **PM10**  
  - 0.147  

- **PM2.5**  
  - 0.061

**Mitigated Emission Factor, \( E_{ext} = \)**

- **PM**  
  - 0.0361  

- **PM10**  
  - 0.134  

- **PM2.5**  
  - 0.030

**Dust Control Efficiency =**

- (pursuant to control measures outlined in fugitive dust control plan)

### Process

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<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
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<tr>
<td>Passenger (entering plant) (one-way trip)</td>
<td>1.71</td>
<td>0.34</td>
<td>0.08</td>
<td>1.57</td>
<td>0.31</td>
<td>0.08</td>
<td>1.57</td>
<td>0.31</td>
<td>0.08</td>
</tr>
<tr>
<td>Passenger (leaving plant) (one-way trip)</td>
<td>1.71</td>
<td>0.34</td>
<td>0.08</td>
<td>1.57</td>
<td>0.31</td>
<td>0.08</td>
<td>1.57</td>
<td>0.31</td>
<td>0.08</td>
</tr>
<tr>
<td>Commercial (entering plant) (one-way trip)</td>
<td>0.27</td>
<td>0.05</td>
<td>0.01</td>
<td>0.25</td>
<td>0.05</td>
<td>0.01</td>
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<tr>
<td>Commercial (entering plant) (one-way trip)</td>
<td>0.27</td>
<td>0.05</td>
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<td>0.01</td>
<td>0.25</td>
<td>0.05</td>
<td>0.01</td>
</tr>
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</table>

**Totals**

- 3.98 tons/yr
- 0.89 tons/yr
- 0.20 tons/yr
- 3.64 tons/yr
- 0.73 tons/yr
- 0.19 tons/yr
- 3.64 tons/yr
- 0.73 tons/yr
- 0.19 tons/yr

### Methodology

- **Total Weight driven per day (ton/day) =** \[\text{MaxWeight Loaded (tons/trip)} \times \text{Max trips per day (trip/day)}\]

- **Maximum one-way distance (miles/day) =** \[\text{MaxWeight driven per day (ton/day)} / \text{MaxWeight Loaded (tons/trip)}\]

- **Average Vehicle Weight Per Trip (ton/trip) =** \[\text{SUM(MaxWeight driven per day (ton/day))} / \text{SUM(MaxWeight Loaded (tons/trip))}\]

- **Unmitigated PTE (tons/yr) =** \[\text{MaxWeight driven per day (ton/day)} \times \text{MaxWeight Loaded (tons/trip)}\]

- **Mitigated PTE (tons/yr) =** \[\text{MaxWeight driven per day (ton/day)} \times \text{Mitigated Emission Factor (lb/mile)}\]

### Abbreviations

- **PM** = Particulate Matter
- **PM10** = Particulate Matter (<10 um)
- **PM2.5** = Particle Matter (<2.5 um)
- **PTE** = Potential to Emit
January 8, 2021

Kate Thomas
Avery Dennison MFD
270 Westmeadow Place
Lowell, IN 46356

Re: Public Notice
Avery Dennison MFD
Permit Level: Title V Sig Permit Mod
Permit Number: 089-42985-00407

Dear Ms. Thomas:

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/](http://www.in.gov/apps/idem/caats/) . Choose Search Option by Permit Number, then enter permit 42985

and

IDEM’s Virtual File Cabinet (VFC): [http://www.IN.gov/idem](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](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 Lowell Public Library, 1505 East Commercial Avenue in Lowell, 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 Olajumoke Kayode, 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 4-5373 or dial (317) 234-5373.

Sincerely,

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 8, 2021

To: Lowell 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

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 Smiddle-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
Notice of Public Comment

January 8, 2021
Avery Dennison MFD
089-42985-00407

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
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

January 8, 2021

A 30-day public comment period has been initiated for:

**Permit Number:** 089-42985-00407
**Applicant Name:** Avery Dennison MFD
**Location:** Lowell, Lake County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:

[http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/)

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at [chammack@idem.IN.gov](mailto:chammack@idem.IN.gov) or (317) 233-2414.

Affected States Notification 1/9/2017
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<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<td>Kate Thomas Avery Dennison MFD 270 Westmeadow Place Lowell IN 46356 (Source CAATS)</td>
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<td>Esteban Garcia Plant Manager Avery Dennison MFD 270 Westmeadow Place Lowell IN 46356 (RO CAATS)</td>
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<td></td>
<td>Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 (Local Official)</td>
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<td>Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)</td>
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<td>Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)</td>
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<td>10</td>
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<td>Mr. Robert Garcia 3733 Parish Avenue East Chicago IN 46312 (Affected Party)</td>
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<td>11</td>
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<td>Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)</td>
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<td>Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)</td>
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<td>Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)</td>
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<td>15</td>
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<td>Lake County Health Department 2900 W 93rd Ave Crown Point IN 46307 (Health Department)</td>
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The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *(Domestic Mail Manual) R900, S913, and S921* for limitations of coverage on insured and COD mail. See *(International Mail Manual)* for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
Mail Code 61-53

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Total number of pieces Listed by Sender
Total number of Pieces Received at Post Office
Postmaster, Per (Name of Receiving employee) The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.