INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

To:	Interested Parties
Date:	July 3, 2024
From:	Jenny Acker, Chief Permits Branch Office of Air Quality
Source Name:	Silgan White Cap Corporation
Permit Level:	FESOP
Permit Number:	177-47153-00001
Source Location:	1701 Williamsburg Pike, Richmond, IN 47374
Type of Action Taken:	Initial Permit

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: http://www.in.gov/apps/idem/caats/
To view the document, choose Search Option **by Permit Number**, then enter permit 47153. This search will also provide the application received date, **draft permit** public notice start and end date, and **final** permit issuance date.

The final decision is also available via IDEM's Virtual File Cabinet (VFC). Please go to: https://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.

(continues on next page)

If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management
Indiana Government Center North, Room 1207
100 North Senate Avenue
Indianapolis, IN 46204
Phone: (317) 232-8667
Fax: (317) 233-6647
Email: IDEMFILEROOM@idem.in.gov

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Indiana Office of Administrative Law Proceedings, 100 N. Senate Avenue Suite N802, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Indiana Office of Administrative Law Proceedings (OALP) or;
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OALP by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OALP by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

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Commissioner

Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

Silgan White Cap Corporation
1701 Williamsburg Pike
Richmond, Indiana 47374

(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. 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 2-8 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.

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

Operation Permit No.: F177-47153-00001 Master Agency Interest ID: 11762	
Issued by: Madhuina Das for Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 3, 2024 Expiration Date: July 3, 2029

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal fabrication products plant.

Source Address:	1701 Williamsburg Pike, Richmond, Indiana 47374
General Source Phone Number:	(765) 983-9200
SIC Code:	3469 (Metal Stampings, Not Elsewhere Classified) 3559 (Special Industry Machinery, Not Elsewhere Classified)
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#5) with a heat input of 12.3 MMBtu/hr, exhausting to stack S5, and consisting of:

(i) a lacquer coating machine, and

(ii) a curing oven, with heat supplied from the catalytic oxidizer (#5).

(b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#8) with a heat input of 12.3 MMBtu/hr, exhausting to stack S8, and consisting of:

(i) a lacquer coating machine, and

(ii) a curing oven, with heat supplied from the catalytic oxidizer (#8).

(c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#10) with a heat input of 9 MMBtu/hr, exhausting to stack S10, and consisting of:

(i) a lacquer coating machine,

(ii) an offset lithographic press with a maximum capacity of 4,500 sheets per hour, and

(iii) a curing oven, with heat supplied from the catalytic oxidizer (#10).

(d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#12) with a heat input of 9 MMBtu/hr, exhausting to stack S12, and consisting of:

(i) a lacquer coating machine,

(ii) two (2) offset lithographic presses, each with a maximum capacity of 4,500 sheets per hour, and

(iii) a curing oven, with heat supplied from the catalytic oxidizer (#12).

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

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

(a) Six (6) plastisol closure gasket curing lines, identified as Plastisol curing lines 1 to 6, all lines constructed in 1967, each line with a maximum throughput rate of 1,630 pounds per hour and 1,000 caps per minute, consisting of one natural gas-fired curing oven rated at 2.6 MMBtu/hr, using no control, and exhausting outdoors.

(b) Fourteen (14) natural gas-fired combustion sources, using no control, exhausting indoors, and consisting of following:

(i) Five (5) space heaters, each rated at 0.8 MMBtu/hr,
(ii) Three (3) space heaters, each rated at 1.4 MMBtu/hr,
(iii) Two (2) space heaters, each rated at 6.6 MMBtu/hr,
(iv) Two (2) space heaters, each rated at 5.9 MMBtu/hr,
(v) One (1) space heater, rated at 0.2 MMBtu/hr, and
(vi) One (1) space heater, rated at 4.2 MMBtu/hr.

(c) Five (5) degreasers, identified as Degreasers 1 to 5, constructed in 2008, with total solvent usage rate of 145 gallons per year, using no control, exhausting indoors, and operated without a remote solvent reservoir.

(d) Seven (7) VOC Storage tanks, identified as Tanks 1 to 7, each with a storage capacity of 275 gallons.

(e) Trimmers that do not produce fugitive emissions, with a maximum throughput rate of 1,630 pounds per hour, using no control, and exhausting indoors.

(f) Grinding and woodworking operations, constructed in 1991, with a maximum flow rate of 1,883 cubic feet per minute and design grain loading of 0.03 grains per actual cubic foot, using a fabric filter as control, and exhausting indoors.

(g) One (1) mixing room, constructed in 1967, with a maximum throughput rate of 1,200 pounds per hour, using no control, and exhausting indoors.

(h) Two (2) PVC and EVA regrind areas, identified as Regrind 1 and Regrind 2, constructed in 1967, each with a maximum throughput rate of 1,500 tons per year, using no control, and exhausting indoors.

(i) PVC extrusion and molding operations, constructed in 1975, with a maximum throughput rate 1,500 tons per year, using no control, and exhausting indoors.

(j) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.

(k) Machining where an aqueous cutting coolant continuously floods the machining interface (Machine Shop).

(l) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment or welding equipment.

(m) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment (Roto-Clone and other systems throughout the plant.).

(o) Process vessel degassing and cleaning to prepare for internal repairs.

(p) Paved and unpaved roads and parking lots with public access.

(q) Asbestos abatement projects regulated by 326 IAC 14-10.

(r) 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.

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

(t) On-site fire and emergency response training approved by the department.

(u) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(v) Seven (7) storage tanks, all constructed in 1991, listed as follows:

Tank ID	Storage Capacity (gallons)	Material Stored
1	7,500	waste solvents
2	5,000	Aromatic 150
3	5,000	reclaimed waste solvent
4	5,000	empty/waste solvents
5	5,000	isophorone
6	5,000	xylene
7	5,000	MIBK

(w) One (1) electric UV oven, used for drying UV ink of image carrier plates, using no control, and exhausting indoors.

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

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, 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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F177-47153-00001, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.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 2-8-6] [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 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(a)(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(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 2-8-4(3); and

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

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

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

(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 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-3(c)(6) 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 2-8 and any other applicable rules.

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to F177-47153-00001 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

(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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, 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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
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 2-8-15(b).

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

(d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) 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).

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:

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.

Testing Requirements [326 IAC 2-8-4(3)]

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:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(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.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Risk Management Plan [326 IAC 2-8-4] [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.12 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

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

(e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 FESOP.

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.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

Stratospheric Ozone Protection

C.16 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) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#5) with a heat input of 12.3 MMBtu/hr, exhausting to stack S5, and consisting of:

(i) a lacquer coating machine, and

(ii) a curing oven, with heat supplied from the catalytic oxidizer (#5).

(b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#8) with a heat input of 12.3 MMBtu/hr, exhausting to stack S8, and consisting of:

(i) a lacquer coating machine, and

(ii) a curing oven, with heat supplied from the catalytic oxidizer (#8).

(c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#10) with a heat input of 9 MMBtu/hr, exhausting to stack S10, and consisting of:

(i) a lacquer coating machine,

(ii) an offset lithographic press with a maximum capacity of 4,500 sheets per hour, and

(iii) a curing oven, with heat supplied from the catalytic oxidizer (#10).

(d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#12) with a heat input of 9 MMBtu/hr, exhausting to stack S12, and consisting of:

(i) a lacquer coating machine,

(ii) two (2) offset lithographic presses, each with a maximum capacity of 4,500 sheets per hour, and

(iii) a curing oven, with heat supplied from the catalytic oxidizer (#12).

Insignificant Activities:

(a) Six (6) plastisol closure gasket curing lines, identified as Plastisol curing lines 1 to 6, all lines constructed in 1967, each line with a maximum throughput rate of 1,630 pounds per hour and 1,000 caps per minute, consisting of one natural gas-fired curing oven rated at 2.6 MMBtu/hr, using no control, and exhausting outdoors.

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-3]

Pursuant to 326 IAC 8-2-3(b)(1), the Permittee shall not allow the discharge into the atmosphere VOC in excess of 0.34 kilograms per liter of coating (2.8 pounds per gallon) excluding water, delivered to the coating applicator at the following coating lines involved in sheet basecoat (exterior and interior) and overvarnish:

Coat-1
Coat-2
Coat-3
Coat-4

D.1.2 FESOP and PSD Minor VOC Limits [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, and in order to render 326 IAC 2-2 not applicable, the combined VOC emissions from the following shall not exceed 90 tons per twelve consecutive month period with compliance determined at the end of each month:

Coat-1
Coat-2
Coat-3
Coat-4
Plastisol curing lines 1 to 6
All solvent cleaning operations

Compliance with this limit combined with the potential VOC emissions of other emission units will limit the source-wide VOC emissions to less than 100 tons per year, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

D.1.3 Hazardous Air Pollutants (HAP) FESOP Limits [326 IAC 2-4.1][326 IAC 2-8-4][40 CFR 63]

(a) The single HAP emissions, combined from the following from any single HAP, shall not exceed 9.9 tons per twelve consecutive month period with compliance determined at the end of each month:

Coat-1
Coat-2
Coat-3
Coat-4
All solvent cleaning operations

Compliance with this limit combined with the potential emissions of any single HAP from other emission units will limit the source-wide single HAP emissions to less than 10 tons per year, and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) The total HAPs emissions from the coating lines (Coat-1 through Coat-4) and all solvent cleaning operations shall not exceed 24.2 tons per twelve consecutive month period with compliance determined at the end of each month:

Coat-1
Coat-2
Coat-3
Coat-4
All solvent cleaning operations

Compliance with this limit combined with the potential emissions of total HAPs from other emission units will limit the source-wide total HAPs emissions to less than 25 tons per year, and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.4 Particulate [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Emissions Limitations), the particulate emissions from each Plastisol curing lines 1 to 6 shall not exceed 0.03 grains per dry standard cubic foot (dscf).

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.6 Catalytic Oxidizer Operation

In order to comply with Conditions D.1.1, D.1.2 and D.1.3, the following catalytic oxidizers for the coating lines shall be in operation and control VOC and HAPs emissions at all times when the coating line associated with these catalytic oxidizers is in operation:

Coat-1	Catalytic oxidizer (#5)
Coat-2	Catalytic oxidizer (#8)
Coat-3	Catalytic oxidizer (#10)
Coat-4	Catalytic oxidizer (#12)

D.1.7 Volatile Organic Compounds and Hazardous Air Pollutant [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC and HAP 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) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the following coating lines:

Coat-1
Coat-2
Coat-3
Coat-4

shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in paragraph (a) above.

This equivalency was determined by the following equation:

$$E = \frac{L}{\left(1-\frac{L}{D}\right)}$$

Where:

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (2.8 lb/gal);

D = Density of VOC in coating in pounds per gallon of VOC (7.36 lb/gal);

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

$$E = \frac{2.8}{\left(1-\frac{2.8}{7.6}\right)} = 4.52$$

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).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than E determined in (b) above.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency (the product of VOC capture and destruction efficiencies) of the catalytic oxidizers shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \left(\frac{V-E}{V}\right) \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all 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 (82.07 lb/gal);

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied (4.52 lb/gal);

O = Equivalent overall efficiency (%) of the capture system and control device as a percentage.

$$O = \left(\frac{82.07-4.52}{82.07}\right) \times 100 = 94.5\ \%$$

The overall efficiency of each catalytic oxidizer shall be equal to or greater than 94.5%.

D.1.8 VOC, Single HAPs and Total HAPs

(a) VOC

In order to comply with the VOC limit specified in the Condition D.1.2, the VOC emissions shall be calculated as follows:

$$\text{VOC emission}\left(\frac{\text{tons}}{\text{month}}\right) = \left\{\sum_{i=1}^{i=4} C_{VOC\ i} \times \left[1-\left(\frac{Ef_{VOC\ cap}}{100} \times \frac{Ef_{VOC\ dest}}{100}\right)\right]\right\} + \left[D \times E \times 2000\left(\frac{lbs}{ton}\right)\right] + S_{VOC}$$

Where:

$C_{VOC\ i}$ = VOC input, tons per month, at coating lines (Coat-1 through Coat-4);

$Ef_{VOC\ cap}$ = VOC capture efficiency, percent (%), of the oxidizer (as determined from the latest IDEM approved stack test) equipped on the subject coating line;

$Ef_{VOC\ dest}$ = VOC destruction efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

D = total compound usage, pound per month, at the six (6) plastisol closure gasket curing lines 1 to 6;

E = emission factor, 0.00022 (lb VOC/ lb Compound);

S_{VOC} = VOC usage, tons per month, due to all the solvent cleaning operations.

(b) Single HAP

In order to comply with the Single HAP limit specified in the Condition D.1.3(a), the Single HAP emissions shall be calculated as follows:

$$\text{Single HAP emissions from any single HAP } \left(\frac{\text{tons}}{\text{month}}\right) = \left\{\sum_{i=1}^{i=4} C_{SH\ i} \times \left[1-\left(\frac{Ef_{HAP\ cap}}{100} \times \frac{Ef_{HAP\ dest}}{100}\right)\right]\right\} + S_{SH}$$

Where:

$C_{SH\ i}$ = Single HAP input, tons per month, at coating lines (Coat-1 through Coat-4)

$Ef_{HAP\ cap}$ = HAP capture efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

$Ef_{HAP\ dest}$ = HAP destruction efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

S_{SH} = Single HAP usage, tons per month, due to all the solvent cleaning operations.

This equation shall be used to determine compliance with Condition D.1.3 for any single HAP that has potential emissions over 10 tons per year.

(c) Total HAPs

In order to comply with the total HAPs limit specified in the Condition D.1.3(b), the total HAPs emissions shall be calculated as follows:

$$\text{Total HAP emissions } \left(\frac{\text{tons}}{\text{month}}\right) = \left\{\sum_{i=1}^{i=4} C_{CH\ i} \times \left[1-\left(\frac{Ef_{HAP\ cap}}{100} \times \frac{Ef_{HAP\ dest}}{100}\right)\right]\right\} + S_{CH}$$

Where:

$C_{CH\ i}$ = Total HAPs input in tons per month at coating lines (Coat-1 through Coat-4);

$Ef_{HAP\ cap}$ = HAP capture efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

$Ef_{HAP\ dest}$ = HAP destruction efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

S_{CH} = Total HAPs usage, tons per month due to all the solvent cleaning operations.

D.1.9 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, the Permittee shall perform the following:

(a) Catalytic oxidizer (#5)

(i) VOC and HAP overall control efficiency (capture and destruction efficiencies) testing for the catalytic oxidizer (#5) no later than 180 days after the re-startup of the coating line (Coat-1) using methods as approved by the Commissioner.

(ii) The HAP destruction efficiency testing shall be performed for the HAP which is used at the source and has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM.

(iii) These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

(b) Catalytic oxidizers (#8, #10, and #12)

(i) VOC and HAP overall control efficiency (capture and destruction efficiencies) testing for the the following catalytic oxidizers no later than five (5) years from the most recent destruction efficiency compliance testing performed on each oxidizer using methods as approved by the Commissioner:

Catalytic oxidizer (#8)
Catalytic oxidizer (#10)
Catalytic oxidizer (#12)

(ii) The HAP destruction efficiency testing shall be performed for the HAP which is used at the source and has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM.

(iii) These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

(c) VOC and HAP capture efficiency testing for the following catalytic oxidizers:

Catalytic oxidizer (#5)
Catalytic oxidizer (#8)
Catalytic oxidizer (#10)
Catalytic oxidizer (#12)

no later than thirty (30) days after a reconfiguration or change in the design of that equipment is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of this equipment, which include any of the following:

(i) Modification to the coating lines (Coat-1 through Coat-4),

(ii) Increasing or decreasing the volumetric flow rate from the ovens, and

(iii) Changing the static duct pressure.

(d) These tests shall be performed using methods as approved by the Commissioner. Testing shall be conducted 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 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.10 Catalytic Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the following catalytic oxidizers for measuring operating temperature:

Catalytic oxidizer (#5)
Catalytic oxidizer (#8)
Catalytic oxidizer (#10)
Catalytic oxidizer (#12)

For the purposes of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average temperature.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid destruction efficiency stack tests that demonstrates compliance with limit in Conditions D.1.1, D.1.2 and D.1.3 as approved by IDEM.

(c) The Permittee shall operate the following catalytic oxidizers at or above the three 3-hour average temperature as observed during the compliant destruction efficiency stack test performed on the catalytic oxidizers:

Catalytic oxidizer (#5)
Catalytic oxidizer (#8)
Catalytic oxidizer (#10)
Catalytic oxidizer (#12)

(d) If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average temperature reading below the above mentioned 3-hour average temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.11 Catalytic Oxidizer Duct Pressure

(a) The Permittee shall determine the appropriate duct pressure for the following catalytic oxidizers from the most recent valid capture efficiency and destruction efficiency stack tests that demonstrates compliance with the limits in Conditions D.1.1, D.1.2 and D.1.3:

Catalytic oxidizer (#5)
Catalytic oxidizer (#8)
Catalytic oxidizer (#10)
Catalytic oxidizer (#12)

(b) The duct pressure shall be observed at least once per day when the following catalytic oxidizers are in operation:

Catalytic oxidizer (#5)
Catalytic oxidizer (#8)
Catalytic oxidizer (#10)
Catalytic oxidizer (#12)

On and after the date the stack tests results are available, the duct pressure shall be maintained within the normal range as established in most recent compliant capture efficiency and destruction efficiency stack tests performed on the catalytic oxidizers.

(c) When, for any one reading, the duct pressure 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 2-8-4(3)]

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) through (5) below for each of the coating lines:

Coat-1
Coat-2
Coat-3
Coat-4

Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Conditions D.1.1, D.1.2 and D.1.3.

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

(2) The amount of each coating material and solvent (excluding cleaning solvent) used less water. Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used.

(3) The amount each solvent used for cleaning purpose.

(4) The VOC, single HAPs, and total HAPs usage.

(5) VOC, single HAPs, and total HAPs emissions

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of total compound usage at the six (6) plastisol closure gasket curing lines 1 to 6. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Condition D.1.2.

(c) To document the compliance status with Condition D.1.10, the Permittee shall maintain the continuous temperature records for the following catalytic oxidizers and the 3-hour average temperature used to demonstrate compliance during the most recent destruction efficiency compliant stack tests:

Catalytic oxidizer (#5)
Catalytic oxidizer (#8)
Catalytic oxidizer (#10)
Catalytic oxidizer (#12)

(d) To document the compliance status with Condition D.1.11, the Permittee shall maintain the daily records of the duct pressure of the following catalytic oxidizers:

Catalytic oxidizer (#5)
Catalytic oxidizer (#8)
Catalytic oxidizer (#10)
Catalytic oxidizer (#12)

The Permittee shall include in its daily record when the duct pressure reading is not taken and the reason for the lack of a duct pressure reading (e.g. the process did not operate that day).

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

D.1.13 Reporting Requirements

A quarterly summary of the information to document the compliance with Conditions D.1.2 and D.1.3 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 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 meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(c) Five (5) degreasers, identified as Degreasers 1 to 5, constructed in 2008, with total solvent usage rate of 145 gallons per year, using no control, exhausting indoors, and operated without a remote solvent reservoir.

(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 2-8-4(1)]

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

(a) Comply with the following control equipment and operating requirements:

(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 subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

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

(b) Comply with the following additional control equipment and operating requirements:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray must be:

(A) performed in an enclosed chamber, with or without venting; or
(B) a solid, fluid stream applied at a pressure that does not cause excessive splashing.

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

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning 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 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.

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

D.2.4 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. These records must be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

(2) The date of purchase (or invoice/bill dates 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).

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(b) Fourteen (14) natural gas-fired combustion sources, using no control, exhausting indoors, and consisting of following:

(i) Five (5) space heaters, each rated at 0.8 MMBtu/hr,
(ii) Three (3) space heaters, each rated at 1.4 MMBtu/hr,
(iii) Two (2) space heaters, each rated at 6.6 MMBtu/hr,
(iv) Two (2) space heaters, each rated at 5.9 MMBtu/hr,
(v) One (1) space heater, rated at 0.2 MMBtu/hr, and
(vi) One (1) space heater, rated at 4.2 MMBtu/hr.

...

(e) Trimmers that do not produce fugitive emissions, with a maximum throughput rate of 1,630 pounds per hour, using no control, and exhausting indoors.

(f) Grinding and woodworking operations, constructed in 1991, with a maximum flow rate of 1,883 cubic feet per minute and design grain loading of 0.03 grains per actual cubic foot, using a fabric filter as control, and exhausting indoors.

(g) One (1) mixing room, constructed in 1967, with a maximum throughput rate of 1,200 pounds per hour, using no control, and exhausting indoors.

(h) Two (2) PVC and EVA regrind areas, Regrind 1 and Regrind 2, constructed in 1967, each with a maximum throughput rate of 1,500 tons per year, using no control, and exhausting indoors.

(i) PVC extrusion and molding operations, constructed in 1975, with a maximum throughput rate 1,500 tons per year, using no control, and exhausting indoors.

...

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

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

D.3.1 Particulate [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Emissions Limitations), the particulate emissions from each of the insignificant activities shall not exceed 0.03 grains per dry standard cubic foot (dscf).

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
FESOP Permit No.: F177-47153-00001

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:	
Email Address:	Phone:
Date:	

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
FESOP Permit No.: F177-47153-00001

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

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
- 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 2-8-12

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

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
FESOP Permit No.: F177-47153-00001
Facility: Coating lines (Coat-1 through Coat-4), six (6) plastisol closure gasket curing lines, and all solvent cleaning operations
Parameter: Combined VOC emissions
Limit: Shall not exceed 90 tons per twelve consecutive month period

QUARTER:_____ YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	(***VOC emissions***) (***tons***)	(***VOC emissions***) (***tons***)	(***VOC emissions***) (***tons***)
	This Month	Previous 11 Months	12 Month Total

☐ 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

FESOP Quarterly Report

Source Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
FESOP Permit No.: F177-47153-00001
Facility: Coating lines (Coat-1 through Coat-4) and all solvent cleaning operations
Parameter: Single HAP emissions (for any single HAP with PTE >10 tons/year)
Limit: Shall not exceed 9.9 tons per twelve consecutive month period

QUARTER:_____ YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	(***Single HAP emissions***) (***tons***)	(***Single HAP emissions***) (***tons***)	(***Single HAP emissions***) (***tons***)
	This Month	Previous 11 Months	12 Month Total

☐ 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

FESOP Quarterly Report

Source Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
FESOP Permit No.: F177-47153-00001
Facility: Coating lines (Coat-1 through Coat-4), six (6) plastisol closure gasket curing lines, and all solvent cleaning operations
Parameter: Total HAP emissions
Limit: Shall not exceed 24.2 tons per twelve consecutive month period

QUARTER:_____ YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	(***Total HAP emissions***) (***tons***)	(***Total HAP emissions***) (***tons***)	(***Total HAP emissions***) (***tons***)
	This Month	Previous 11 Months	12 Month Total

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

Source Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
FESOP Permit No.: F177-47153-00001

Months: _____ to _____ Year: _____

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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Transitioning to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	**Silgan White Cap Corporation**
Source Location:	**1701 Williamsburg Pike, Richmond, Indiana 47374**
County:	**Wayne**
SIC Code:	**3469 (Metal Stampings, Not Elsewhere Classified)** **3559 (Special Industry Machinery, Not Elsewhere Classified)**
Operation Permit No.:	**F177-47153-00001**
Permit Reviewer:	**Alexandrea Neuzerling**

On October 23, 2023, the Office of Air Quality (OAQ) received an application from Silgan White Cap Corporation related to the transition of a Part 70 Operating Permit to a FESOP.

Existing Approvals

The source has been operating under Part 70 Operating Permit Renewal No. T177-41146-00001, issued on August 19, 2019. There have been no subsequent approvals issued.

Due to this application, the source is transitioning from a Part 70 Operating Permit to a FESOP.

County Attainment Status

The source is located in Wayne County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO_2	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO_2 standard. Better than national secondary standards effective March 3, 1978.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
$PM_{2.5}$	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO_2 standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Wayne 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 of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Wayne 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) 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

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Silgan White Cap Corporation on October 23, 2023, relating to transitioning from a Part 70 Operating Permit to a FESOP.

(1) In order to transition from a Part 70 Operating Permit to a FESOP, the source has opted to take a limit of less than 90 tons of VOC emissions per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

This source has existing single HAP and total HAP limitations that render this source an area source of HAPs.

(2) There are no new or modified emission units at the source.

(3) The following is a list of the insignificant activities that have been removed:

(a) Two (2) plastisol closure gasket curing lines, identified as plastisol, all lines constructed in 1967, each line with a maximum throughput rate of 1,630 pounds per hour and 1,000 caps per minute, consisting of one natural gas-fired curing oven rated at 2.6 MMBtu/hr, using no control, and exhausting outdoors.

(b) Two (2) degreasers, constructed in 2008, with total solvent usage rate of less than 145 gallons per year, using no control, exhausting indoors, and operated without a remote solvent reservoir.

(4) The following is a list of the existing emission units:

(a) One (1) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#5) with a heat input of 12.3 MMBtu/hr, exhausting to stack S5, and consisting of:

(i) a lacquer coating machine, and

(ii) a curing oven, with heat supplied from the catalytic oxidizer (#5).

(b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#8) with a heat input of 12.3 MMBtu/hr, exhausting to stack S8, and consisting of:

(i) a lacquer coating machine, and

(ii) a curing oven, with heat supplied from the catalytic oxidizer (#8).

(c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#10) with a heat input of 9 MMBtu/hr, exhausting to stack S10, and consisting of:

(i) a lacquer coating machine,

(ii) an offset lithographic press with a maximum capacity of 4,500 sheets per hour, and

(iii) a curing oven, with heat supplied from the catalytic oxidizer (#10).

(d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6,000 aluminum metal sheets per hour, using reverse roll coating applicators, controlled by a catalytic oxidizer (#12) with a heat input of 9 MMBtu/hr, exhausting to stack S12, and consisting of:

(i) a lacquer coating machine,

(ii) two (2) offset lithographic presses, each with a maximum capacity of 4,500 sheets per hour, and

(iii) a curing oven, with heat supplied from the catalytic oxidizer (#12).

(5) The following is a list of the existing insignificant activities:

(a) ~~Eight (8)~~ **Six (6)** plastisol closure gasket curing lines, identified as plastisol, all lines constructed in 1967, each line with a maximum throughput rate of 1,630 pounds per hour and 1,000 caps per minute, consisting of one natural gas-fired curing oven rated at 2.6 MMBtu/hr, using no control, and exhausting outdoors.

(b) Fourteen (14) natural gas-fired combustion sources, using no control, exhausting indoors, and consisting of following:

(i) Five (5) space heaters, each rated at 0.8 MMBtu/hr
(ii) Three (3) space heaters, each rated at 1.4 MMBtu/hr
(iii) Two (2) space heaters, each rated at 6.6 MMBtu/hr
(iv) Two (2) space heaters, each rated at 5.9 MMBtu/hr
(v) One (1) space heater, rated at 0.2 MMBtu/hr
(vi) One (1) space heater, rated at 4.2 MMBtu/hr

(c) ~~Seven (7)~~ **Five (5)** degreasers, **identified as Degreasers 1 to 5,** constructed in 2008, with total solvent usage rate of 145 gallons per year, using no control, exhausting indoors, and operated without a remote solvent reservoir.

(d) Seven (7) VOC Storage tanks, each with a storage capacity of 275 gallons.

(e) Trimmers that do not produce fugitive emissions, with a maximum throughput rate of 1,630 pounds per hour, using no control, and exhausting indoors.

(f) Grinding and woodworking operations, constructed in 1991, with a maximum flow rate of 1,883 cubic feet per minute and design grain loading of 0.03 grains per actual cubic foot, using a fabric filter as control, and exhausting indoors.

(g) One (1) mixing room, constructed in 1967, with a maximum throughput rate of 1,200 pounds per hour, using no control, and exhausting indoors.

(h) Two (2) PVC and EVA regrind areas, constructed in 1967, each with a maximum throughput rate of 1,500 tons per year, using no control, and exhausting indoors.

(i) PVC extrusion and molding operations, constructed in 1975, with a maximum throughput rate 1,500 tons per year, using no control, and exhausting indoors.

(j) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.

(k) Machining where an aqueous cutting coolant continuously floods the machining interface (Machine Shop).

(l) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment or welding equipment.

(m) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment (Roto-Clone and other systems throughout the plant.).

(o) Process vessel degassing and cleaning to prepare for internal repairs.

(p) Paved and unpaved roads and parking lots with public access.

(q) Asbestos abatement projects regulated by 326 IAC 14-10.

(r) 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.

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

(t) On-site fire and emergency response training approved by the department.

(u) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(v) Storage tanks, all constructed in 1991, listed as follows:

Tank ID	Storage Capacity (gallons)	Material Stored
1	7,500	waste solvents
2	5,000	Aromatic 150
3	5,000	reclaimed waste solvent
4	5,000	empty/waste solvents
5	5,000	isophorone
6	5,000	xylene
7	5,000	MIBK

(w) One (1) electric UV oven, used for drying UV ink of image carrier plates, using no control, and exhausting indoors.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

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

Permit Level Determination – FESOP

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

	Unrestricted Source-Wide Emissions (ton/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Excluding Fugitives*	24.03	25.27	25.27	0.21	35.56	2,779.00	29.87	326.93	1188.30
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

[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.

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is equal to or greater than one hundred (100) tons per year. The potential to emit of all other regulated air pollutants is less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit HAP emissions to less than the Title V major source threshold levels. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

PTE of the Entire Source After Issuance of the FESOP

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 this FESOP, 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.

	Source-Wide Emissions After Issuance (ton/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Excluding Fugitives*	24.03	25.27	25.27	0.21	35.56	99.75	29.87	9.90	24.87
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

[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.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take VOC, Single HAP, and Total HAP limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source and 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 2-2 (PSD), 326 IAC 2-8 (FESOP), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing stationary source is minor under Title V (326 IAC 2-7) because the potential to emit regulated air pollutants and HAPs from the entire source is less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing stationary source is minor under PSD (326 IAC 2-2) because the potential to emit of all PSD regulated pollutants from the entire source is less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

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

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for this source, because each tanks is smaller than 75 cubic meters.

(b) The requirements of the New Source Performance Standard for Metal Surface Coating, 40 CFR 60, Subpart TT and 326 IAC 12, are not included in the permit for this source, because the coating lines were constructed prior to January 5, 1981 and have not been modified.

(c) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW and 326 IAC 12, are not included in the permit for this source, because the coating lines were constructed prior to November 26, 1980 and have not been modified.

(d) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T and 326 IAC 20-6, are not included in the permit for this source, since the degreasers do not use solvent that contains any of the materials specified in 40 CFR 63.460.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK and 326 IAC 20-86, are not included in the permit for this source, since this source is not a major source of HAPs.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95, are not included in the permit for this source, since this source is not a major source of HAPs.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit for this source, since this source does not perform paint stripping and does not use any coating material which contains target HAPs.

(e) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability - Entire Source

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

326 IAC 2-2 (PSD)
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

PSD Minor Source Limit(s)

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

> The combined VOC emissions from the coating lines (Coat-1 through Coat-4), six (6) plastisol closure gasket curing lines, and all solvent cleaning operations shall not exceed 90 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

FESOP VOC Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

> The combined VOC emissions from the coating lines (Coat-1 through Coat-4), six (6) plastisol closure gasket curing lines, and all solvent cleaning operations shall not exceed 90 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

FESOP HAP Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) The single HAP emissions, combined from the coating lines (Coat-1 through Coat-4) and all solvent cleaning operations, from any single HAP shall not exceed 9.9 tons per twelve consecutive month period with compliance determined at the end of each month.

The HAPs are the following:

Xylene	MIK	Benzene	Cumene	Glycol Ethers	Isophorone

(b) The total HAPs emissions from the coating lines (Coat-1 through Coat-4) and all solvent cleaning operations shall not exceed 24.2 tons per twelve 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 HAPs 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) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source (located in Wayne County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

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

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Wayne County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

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

Coating Lines (Coat-1 through Coat-4)

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The coating lines are not subject to the requirements of 326 IAC 8-1-6 because the lines are regulated by other rules in 326 IAC 8. The coating lines are subject to the requirements of 326 IAC 8-2-3 (Can Coating Operations).

326 IAC 8-2-3 (Can Coating Operations)
The coating lines (Coat-1 through Coat-4), consisting of lacquer coating machines, offset lithographic presses and curing ovens, are subject to the requirements of this rule because these emission units are existing as of January 1, 1980 and surface coating of aluminum sheets which involve basecoat (exterior and interior) and overvarnish are performed at these emission units.

(a) Pursuant to 326 IAC 8-2-3(b)(1), the Permittee shall not allow the discharge into the atmosphere VOC in excess of 0.34 kilograms per liter of coating (2.8 pounds per gallon) excluding water, as delivered to the coating applicator at the coating lines (Coat-1 through Coat-4) involved in sheet basecoat (exterior and interior) and overvarnish.

Each coating line (Coat-1 through Coat-4) is equipped with its own catalytic oxidizer to comply with this limit. These catalytic oxidizers shall be in operation and control VOC emissions at all times when the coating lines (Coat-1 through Coat-4) are in operation to comply with this limit.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the coating lines (Coat-1 through Coat-4) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in paragraph (a) above.

This equivalency was determined by the following equation:

$$E = \frac{L}{\left(1-\frac{L}{D}\right)}$$

Where:

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (2.8 lb/gal);

D = Density of VOC in coating in pounds per gallon of VOC (7.36 lb/gal);

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

$$E = \frac{2.8}{\left(1-\frac{2.8}{7.6}\right)} = 4.52$$

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).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than E determined in (b) above.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency (the product of VOC capture and destruction efficiencies) of the catalytic oxidizers shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \left(\frac{V\text{-}E}{V}\right) \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all 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 (82.07 lb/gal);

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied (4.52 lb/gal) (see paragraph (b) above on how this value was calculated);

O = Equivalent overall efficiency (%) of the capture system and control device as a percentage.

$$O = \left(\frac{82.07\text{-}4.52}{82.07}\right) \times 100 = 94.5\ \%$$

The overall efficiency of each catalytic oxidizer shall be equal to or greater than 94.5%.

Note: The existing permit specifies 79.4% overall efficiency for each catalytic oxidizer. This value is now changed to 94.5% based on the updated information provided by the source and above calculations through this renewal.

Plastisol Closure Gasket Curing Lines

326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from each of the curing lines shall not exceed 0.03 grain per dry standard cubic foot (dscf).

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though the curing lines were constructed after January 1, 1980, the lines are not subject to the requirements of 326 IAC 8-1-6 because the total unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Natural Gas Combustion

326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(b)(2), particulate matter (PM) emissions from each of the natural gas combustion units shall not exceed 0.01 grain per dry standard cubic foot (dscf).

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
None of the natural gas combustion units are subject to 326 IAC 326 IAC 7-1.1 because the total potential to emit (or limited potential to emit) sulfur dioxide (SO2) is less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though the natural gas combustion units were constructed after January 1, 1980, the heaters are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions are less

than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the natural gas combustion units, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the natural gas combustion units, since the units are not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

PVC Extrusion and Molding

326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the PVC extrusion and molding shall not exceed 0.03 grain per dry standard cubic foot (dscf).

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The PVC extrusion and molding is not subject to the requirements of 326 IAC 8-1-6 because it was constructed before January 1, 1980 and emits less than 25 tons VOC per year.

Mixing Room

326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the mixing room shall not exceed 0.03 grain per dry standard cubic foot (dscf).

PVC and EVA Regrind Area

326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the PVC and EVA regrind area shall not exceed 0.03 grain per dry standard cubic foot (dscf).

Trimmers

326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from each of the trimmers shall not exceed 0.03 grain per dry standard cubic foot (dscf).

Grinding and Woodworking Operations

326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the grinding and woodworking operations shall not exceed 0.03 grain per dry standard cubic foot (dscf).

Degreasing

326 IAC 8-3-2 (Cold Cleaner Operations)
Pursuant to 326 IAC 8-3-1(c)(1)(B), the degreasing operation is subject to the requirements of 326 IAC 8-3-2, because it is a cold cleaner degreaser that was constructed after January 1, 1980.

(a) Comply with the following control equipment and operating requirements:

(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 subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

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

(b) Comply with the following additional control equipment and operating requirements:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray must be:

(A) performed in an enclosed chamber, with or without venting; or
(B) a solid, fluid stream applied at a pressure that does not cause excessive splashing.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreaser)
Pursuant to 326 IAC 8-3-1(c)(3)(B), the degreasing operation is subject to the requirements of 326 IAC 8-3-8, because it is a cold cleaner degreaser that uses a solvent containing one or more VOCs.

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning 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).

VOC Storage Tanks

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though the storage tanks were constructed after January 1, 1980, the units are not subject to the requirements of 326 IAC 8-1-6 because the total unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Compliance Determination and Monitoring Requirements

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

(1) In order to comply with the requirements of 326 IAC 8-2-3, 326 IAC 2-2 and 326 IAC 2-8-4, and in order to render the source and area source of HAPs, the catalytic oxidizers for

coating lines (Coat-1 through Coat-4) shall be in operation and control VOC and HAPs emissions at all times when the coating line associated with these catalytic oxidizers is in operation.

(2) Compliance with the VOC and HAP limitations 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.

(3) In order to comply with the VOC limit under 326 IAC 2-2 and 326 IAC 2-8-4, the VOC emissions shall be calculated as follows:

$$\text{VOC emission}\left(\frac{\text{tons}}{\text{month}}\right) = \left\{\sum_{i=1}^{i=4} C_{VOC\ i} \times \left[1-\left(\frac{Ef_{VOC\ cap}}{100} \times \frac{Ef_{VOC\ dest}}{100}\right)\right]\right\} + \left[D \times E \times 2000\left(\frac{\text{lbs}}{\text{ton}}\right)\right] + S_{VOC}$$

Where:

$C_{VOC\ i}$ = VOC input, tons per month, at coating lines (Coat-1 through Coat-4);

$Ef_{VOC\ cap}$ = VOC capture efficiency, percent (%), of the oxidizer (as determined from the latest IDEM approved stack test) equipped on the subject coating line;

$Ef_{VOC\ dest}$ = VOC destruction efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

D = total compound usage, pound per month, at the eight (8) plastisol closure gasket curing line;

E = emission factor, 0.00022 (lb VOC/ lb Compound);

S_{VOC} = VOC usage, tons per month, due to all the solvent cleaning operations.

(4) In order to comply with the Single HAP limit, the Single HAP emissions shall be calculated as follows:

$$\text{Single HAP emissions from any single HAP}\left(\frac{\text{tons}}{\text{month}}\right) = \left\{\sum_{i=1}^{i=4} C_{SH\ i} \times \left[1-\left(\frac{Ef_{HAP\ cap}}{100} \times \frac{Ef_{HAP\ dest}}{100}\right)\right]\right\} + S_{SH}$$

Where:

$C_{SH\ i}$ = Single HAP input, tons per month, at coating lines (Coat-1 through Coat-4)

$Ef_{HAP\ cap}$ = HAP capture efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

$Ef_{HAP\ dest}$ = HAP destruction efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

S_{SH} = Single HAP usage, tons per month, due to all the solvent cleaning operations.

(5) In order to comply with total HAPs limit, the total HAPs emissions shall be calculated as follows:

$$\text{Total HAP emissions}\left(\frac{\text{tons}}{\text{month}}\right) = \left\{\sum_{i=1}^{i=4} C_{CH\,i} \times \left[1-\left(\frac{Ef_{HAP\ cap}}{100} \times \frac{Ef_{HAP\ dest}}{100}\right)\right]\right\} + S_{CH}$$

Where:

$C_{CH\,i}$ = Total HAPs input in tons per month at coating lines (Coat-1 through Coat-4);

$Ef_{HAP\ cap}$ = HAP capture efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

$Ef_{HAP\ dest}$ = HAP destruction efficiency, percent (%), of the oxidizer (as determined from the most recent valid compliance testing) equipped on the subject coating line;

S_{CH} = Total HAPs usage, tons per month due to all the solvent cleaning operations.

Testing Requirements:

Summary of Testing Requirements					
Emission Unit	**Control Device**	**Timeframe for Testing or Date of Most Recent Valid Demonstration**	**Pollutant/ Parameter**	**Frequency of Testing**	**Authority**
Coat-1	Catalytic Oxidizer (#5)	180*	VOC Destruction Efficiency	Every 5 years	326 IAC 2-2 326 IAC 2-8-4 326 IAC 8-2-3
			VOC Capture Efficiency		
			HAP Destruction Efficiency		326 IAC 2-4.1 326 IAC 2-8-4
Coat-2	Catalytic Oxidizer (#8)	April 1, 2022**	VOC Destruction Efficiency	Every 5 years	326 IAC 2-2 326 IAC 2-8-4 326 IAC 8-2-3
			VOC Capture Efficiency		
			HAP Destruction Efficiency		326 IAC 2-4.1 326 IAC 2-8-4
Coat-3	Catalytic Oxidizer (#10)	March 31, 2020**	VOC Destruction Efficiency	Every 5 years	326 IAC 2-2 326 IAC 2-8-4 326 IAC 8-2-3
			VOC Capture Efficiency		
			HAP Destruction Efficiency		326 IAC 2-4.1 326 IAC 2-8-4
Coat-4	Catalytic Oxidizer (#12)	May 13, 2020**	VOC Destruction Efficiency	Every 5 years	326 IAC 2-2 326 IAC 2-8-4 326 IAC 8-2-3
			VOC Capture Efficiency		
			HAP Destruction Efficiency		326 IAC 2-4.1 326 IAC 2-8-4
Compliance monitoring parameter value(s) or specification(s) from the most recent compliant stack test will be					

specified in the stack test report available via IDEM's Virtual File Cabinet (VFC): https://www.in.gov/idem/ and enter VFC in the search box with options to search for permit documents using a variety of criteria.

* The existing testing requirements indicate that testing be conducted for Coat-1 no later than 180 days after the re-startup of this line.

Coating line Coat-1 has not been re-started and will retain the existing testing requirement of testing no later than 180 days after the re-startup of Coat-1.

** The capture efficiency test shall be performed on the catalytic oxidizers no later than thirty (30) days after a reconfiguration or change in the design of that equipment is made and for those instances where operating parameters indicate that a fundamental change has taken place in the operation of this equipment, which include any of the following:

(i) Modification to the coating lines (Coat-1 through Coat-4),

(ii) Increasing or decreasing the volumetric flow rate from the ovens, and

(iii) Changing the static duct pressure.

These are existing testing requirements and no change has been made due to this permit.

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

Control Device	Type of Parametric Monitoring	Frequency	Range or Specification
catalytic oxidizer #5	3-hour average Oxidizer Temperature monitoring	Continuous*	At or above the 3-hour average temperature observed during the compliant destruction efficiency stack test
	Duct Pressure**	Daily	Within normal range observed during most recent stack test
catalytic oxidizer #8	3-hour average Oxidizer Temperature monitoring	Continuous*	At or above the 3-hour average temperature observed during the compliant destruction efficiency stack test
	Duct Pressure**	Daily	Within normal range observed during most recent stack test
catalytic oxidizer #10	3-hour average Oxidizer Temperature monitoring	Continuous*	At or above the 3-hour average temperature observed during the compliant destruction efficiency stack test
	Duct Pressure**	Daily	Within normal range observed during most recent stack test
catalytic oxidizer #12	3-hour average Oxidizer Temperature monitoring	Continuous*	At or above the 3-hour average temperature observed during the compliant destruction efficiency stack test
	Duct Pressure**	Daily	Within normal range observed during most recent stack test

* Continuous means no less than once per fifteen (15) minutes. These are existing compliance monitoring requirements and no change has been made to this compliance monitoring requirement due to this permit.

** Since the capture and destruction efficiency testing are performed at a different time, the duct pressure range observed during both testing may not be the same. The Permittee shall ensure that the duct pressure is maintained such that the pressure drop reading satisfies both ranges. IDEM compliance staff was consulted by the permit writer and it was concluded that the pressure drop reading must satisfy both ranges.

These monitoring conditions are necessary because the catalytic oxidizers for the coating lines must operate properly to assure compliance with 326 IAC 8-2-3, 326 IAC 2-2, 326 IAC 2-4.1, and 326 IAC 2-8-4.

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 October 23, 2023.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. F177-47153-00001. The staff recommends to the Commissioner that the FESOP be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Alexandrea Neuzerling, 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) 232-6634 or (800) 451-6027, and ask for Alexandrea Neuzerling or (317) 232-6634.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

Appendix A: Emissions Calculations
Emissions Summary

Company Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
Permit Number: F177-47153-00001
Reviewer: Alexandrea Neuzerling

Potential To Emit (tons/year)

Emission Unit	PM	PM10	PM2.5	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP (Glycol Ethers)
Coat-1	-	-	-	-	-	634.83	-	276.36	76.08
Coat- 2	-	-	-	-	-	634.83	-	276.36	76.08
Coat-3	-	-	-	-	-	697.02	-	303.76	83.62
Coat-4	-	-	-	-	-	801.57	-	331.15	91.16
Six (6) plastisol closure gasket curing lines	14.22	14.22	14.22	-	-	1.01	-	-	-
Natural Gas Combustion	0.68	2.70	2.70	0.21	35.56	1.96	29.87	0.67	-
PVC Extrusion and Molding	0.0015	0.0015	0.0015	-	-	0.1923	-	0.0003	-
Mixing Room	1.58	0.79	0.79	-	-	-	-	-	-
Two (2) PVC and EVA regrind areas	0.44	0.44	0.44	-	-	-	-	-	-
Trimmers	4.99	4.99	4.99	-	-	-	-	-	-
Degreasing	-	-	-	-	-	0.60	-	-	-
Woodworking/Grinding	2.12	2.12	2.12	-	-	-	-	-	-
Seven (7) VOC Storage Tanks**	-	-	-	-	-	7.00	-	-	-
Total without Fugitive Emissions	**24.03**	**25.27**	**25.27**	**0.21**	**35.56**	**2779.00**	**29.87**	**1188.30**	**326.93**
Paved Roads	0.96	0.19	0.05	-	-	-	-	-	-
Total with Fugitive Emissions	**24.99**	**25.46**	**25.32**	**0.21**	**35.56**	**2779.00**	**29.87**	**1188.30**	**326.93**

Limited Potential To Emit (tons/year)

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP (Glycol Ethers)
Coat-1	-	-	-	-	-	90.0 *	-	24.2 *	9.9 *
Coat- 2	-	-	-	-	-		-		
Coat-3	-	-	-	-	-		-		
Coat-4	-	-	-	-	-		-		
Six (6) plastisol closure gasket curing lines	14.22	14.22	14.22	-	-		-		
Natural Gas Combustion	0.68	2.70	2.70	0.21	35.56	1.96	29.87	0.67	-
PVC Extrusion and Molding	0.002	0.002	0.002	-	-	0.19	-	0.0003	-
Mixing Room	1.58	0.79	0.79	-	-	-	-	-	-
Two (2) PVC and EVA regrind areas	0.44	0.44	0.44	-	-	-	-	-	-
Trimmers	4.99	4.99	4.99	-	-	-	-	-	-
Degreasing	-	-	-	-	-	0.60	-	-	-
Woodworking/Grinding	2.12	2.12	2.12	-	-	-	-	-	-
Seven (7) VOC Storage Tanks**	-	-	-	-	-	7.00	-	-	-
Total without Fugitive Emissions	**24.03**	**25.27**	**25.27**	**0.21**	**35.56**	**99.75**	**29.87**	**24.87**	**9.90**
Paved Roads	0.96	0.19	0.05	-	-	-	-	-	-
Total with Fugitive Emissions	**24.99**	**25.46**	**25.32**	**0.21**	**35.56**	**99.75**	**29.87**	**24.87**	**9.90**

Shaded cells indicate limits.

* PTE is limited to render the requirements of 326 IAC 2-2 and 326 IAC 2-7 not applicable and render the source an area source of HAPs.
** A conservative estimate of 1 ton of VOC per year has been assumed for each of the seven (7) VOC storage tanks.

Appendix A: Emissions Calculations
VOC & Particulate from Surface Coating operations

Company Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
Permit Number: F177-47153-00001
Reviewer: Alexandrea Neuzerling

VOC and PM Emissions

Coating Line		Density Lb/Gal	Weight % Volatile (H2O & Organics)	Wt. % Water	Wt. % Organics	Vol.% Water	Vol.% Non-Vol Solids	Maximum (gallons/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential to emit VOC tons per year	Potential to emit Particulate (ton/yr)	lb VOC /gal solids	Transfer Efficiency
Coat-1	lacquer coating machine	7.80	89.23%	0.00	89.23%	0%	8.48%	20.58	6.96	6.96	143.24	3437.65	627.37	0.00	82.07	100%
	Solvent operations	7.88	1.00	0.00	100%	0%	0%	0.216	7.88	7.88	1.70	40.85	7.46	0.00	7.88	100%
												Sub total	**634.83**			
Coat- 2	lacquer coating machine	7.80	89.23%	0.00	89.23%	0%	8.48%	20.58	6.96	6.96	143.24	3437.65	627.37	0.00	82.07	100%
	Solvent operations	7.88	1.00	0.00	100%	0%	0%	0.216	7.88	7.88	1.70	40.85	7.46	0.00	7.88	100%
												Sub total	**634.83**			
Coat-3	lacquer coating machine	7.80	89.23%	0.00	89.23%	0%	8.48%	20.58	6.96	6.96	143.24	3437.65	627.37	0.00	82.07	100%
	offset lithographic press	7.80	89.23%	0.00	89.23%	0%	8.48%	2.04	6.96	6.96	14.20	340.76	62.19	0.00	82.07	100%
	Solvent operations	7.88	1.00	0.00	100%	0%	0%	0.216	7.88	7.88	1.70	40.85	7.46	0.00	7.88	100%
												Sub total	**697.02**			
Coat-4	lacquer coating machine	7.80	89.23%	0.00	89.23%	0%	8.48%	20.58	6.96	6.96	143.24	3437.65	627.37	0.00	82.07	100%
	offset lithographic press #1	7.80	89.23%	0.00	89.23%	0%	8.48%	2.04	6.96	6.96	14.20	340.76	62.19	0.00	82.07	100%
	offset lithographic press #2	8.80	189.23%	1.00	89.23%	0%	108.48%	3.04	7.85	7.85	23.87	572.90	104.55	1.00	7.24	100%
	Solvent operations	7.88	1.00	0.00	100%	0%	0%	0.216	7.88	7.88	1.70	40.85	7.46	0.00	7.88	100%
												Sub total	**801.57**			

METHODOLOGY
The calculations are performed considering the worst case emissions coating materials and solvents used at all the coating lines
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Sub total = Worst Coating + Sum of all solvents used

HAP Emissions

Coating Line / Coating Material		Density	Maximum Usage	Wt %	Wt %	Wt %	Wt %	Wt %	Wt %	Xylene Emissions	MIK Emissions	Benzene Emissions	Cumene Emissions	Glycol Ethers Emissions	Isophorone Emissions	Total
		(Lb/Gal)	(gallons/hour)	Xylene	MIK	ethyl Benzene	Cumene	Glycol Ethers	isophorone	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
Coat-1	lacquer coating machine	7.75	20.58	3.02%	12.59%	0.78%	1.45%	10.89%	10.83%	21.10	87.95	5.45	10.13	76.08	75.66	276.36
Coat- 2	lacquer coating machine	7.75	20.58	3.02%	12.59%	0.78%	1.45%	10.89%	10.83%	21.10	87.95	5.45	10.13	76.08	75.66	276.36
Coat-3	lacquer coating machine	7.75	20.58	3.02%	12.59%	0.78%	1.45%	10.89%	10.83%	21.10	87.95	5.45	10.13	76.08	75.66	276.36
	offset lithographic press	7.75	2.04	3.02%	12.59%	0.78%	1.45%	10.89%	10.83%	2.09	8.72	0.54	1.00	7.54	7.50	27.39
Coat-4	lacquer coating machine	7.75	20.58	3.02%	12.59%	0.78%	1.45%	10.89%	10.83%	21.10	87.95	5.45	10.13	76.08	75.66	276.36
	offset lithographic press #1	7.75	2.04	3.02%	12.59%	0.78%	1.45%	10.89%	10.83%	2.09	8.72	0.54	1.00	7.54	7.50	27.39
	offset lithographic press #2	7.75	2.04	3.02%	12.59%	0.78%	1.45%	10.89%	10.83%	2.09	8.72	0.54	1.00	7.54	7.50	27.39
									Total HAPs (tons/yr):	**90.66**	**377.96**	**23.42**	**43.53**	**326.93**	**325.13**	**1187.63**

METHODOLOGY
The calculations are performed considering the worst case HAP emissions coating materials used at all the coating lines.
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

Company Name: **Silgan White Cap Corporation**
Source Address: **1701 Williamsburg Pike, Richmond, Indiana 47374**
Permit Number: **F177-47153-00001**
Reviewer: **Alexandrea Neuzerling**

Emission Unit	Heat Input Capacity (MMBtu/hr)
Catalytic Oxidizer #5	12.3
Catalytic Oxidizer #8	12.3
Catalytic Oxidizer #10	9
Catalytic Oxidizer #12	9
Oven for Plastisol Closure Gasket Curing Lines	2.6
Space Heaters	37.6
Total	**82.8**

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
82.8	1020	711.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.68	2.70	2.70	0.21	35.56	1.96	29.87

*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

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)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	7.5E-04	4.3E-04	2.7E-02	0.64	1.2E-03	**0.67**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.8E-04	3.9E-04	5.0E-04	1.4E-04	7.5E-04	**1.9E-03**

Total HAPs	**0.67**
Worst HAP	**0.64**

Methodology is the same as above.
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
Insignificant Activities

Company Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
Permit Number: F177-47153-00001
Reviewer: Alexandrea Neuzerling

PVC Extrusion and Molding

Maximum Potential Throughput (tons/yr)	Maximum Potential Throughput (tons/hr)	PM/PM10 Emission Factor (lbs/ton)	PTE PM/PM10 (tons/yr)	VOC Emission Factor (lbs/ton)	PTE VOC (tons/yr)	HAPs Emission Factor (lbs/ton)	Total PTE HAPs (tons/yr)
1,500	0.17	2.0E-03	1.5E-03	0.26	0.19	3.6E-04	2.7E-04

Methodology
The emission factors are from an Air & Waste Management Association Paper:
"Development of Emission Factors for Ethylene-Vinyl Acetate and Ethylene-Methyl Acrylate Copolymer Processing" October 1997
Maximum Potential Throughput (tons/yr) = 2005 Throughput Rate (tons/yr) / 2005 Percent Utilization (%) x 1/2005 Hours of Operation x 8760 hrs/yr
Maximum Potential Throughput (tons/hr) = Maximum Potential Throughput (tons/yr) x 1 yr/8760 hrs
PTE (tons/yr) = Maximum Throughput Rate (tons/hr) x Emission Factor (lbs/ton) x 8,760 hrs/yr x 1 ton/2,000 lbs

Two (2) PVC and EVA regrind areas

			PM		PM/PM10/PM2.5
	Max Throughput Rate (tons of resins/yr)	Max Throughput Rate (lbs resin/hr)	Emission Factor (lbs/10^6 lbs)	Uncontrolled Emissions (lbs/hr)	Uncontrolled Emissions (tons/yr)
One PVC and EVA regrind area	1,500	342.47	148	0.05	0.22
Total for two (2) PVC and EVA regrind area		685	296	0.101	**0.444**

Methodology
PM=PM10=PM2.5
Emission factor is from Mass balance on plastics grinding at Primex Plastics permit #177-12874-00065.
Emissions (lbs/hr) = Max Throughput Rate (lbs resin/hr) x Emission Factor (lbs/10^6 lbs)
PTE (tons/yr) = Maximum Throughput Rate (tons/hr) x Emission Factor (lbs/ton) x 8,760 hrs/yr x 1 ton/2,000 lbs

Trimmers and Grinding/Woodworking

	Uncontrolled PM (tons/yr)	Uncontrolled PM10 (tons/yr)	Uncontrolled PM2.5 (tons/yr)
Trimmers	less than 5	less than 5	less than 5
Grinding	2.12	2.12	2.12

Methodology
Trimmers are insignificant activity as defined in 326 IAC 2-7-21(J)(xi). Conservatively it is assumed that particulate emissions from these activities does not exceed exemption level specified in 326 IAC 2-1.1-3(e)(1)(Exemptions level).
Emissions (lbs/hr)= Grain loading (gr/dscf) x Air Flow (dscf/min) x (60min/hr)/ 7000 (gr/lb)
Grinding emissions are before the use of control.

Mixing Room

Max Throughput Rate (lbs/hr)	PM emission Factor (lbs/ton processed)	PM10 emission Factor (lbs/ton processed)	Uncontrolled PM Emissions (lbs/hr)	Uncontrolled PM10 Emissions (lbs/hr)	Uncontrolled PM Emissions (tons/yr)	Uncontrolled PM10 Emissions (tons/yr)	Uncontrolled PM2.5 Emissions (tons/yr)
1200	0.6	0.3	0.36	0.18	1.58	0.79	0.79

Methodology
Emission factor is from SCC 3-05-012-23 Fiberglass Manufacturing - Raw Material: Mixing/Weighing.
Asuumption: PM10=PM2.5
Emissions (lbs/hr) = Max Throughput Rate (lbs resin/hr) x Emission Factor (lbs/ton processed)
Emissions (tons/yr) = Emissions (lbs/hr) x 8760 (hrs/yr) / 2000 (lbs/ton)

Six (6) plastisol closure gasket curing lines

		VOC			PM		
Maximum Production Rate (caps/minute)	Compound usage rate (lbs/1000 cap)	Emission Factor (lb VOC / lb Compound)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lb / lb Compound)	Emissions (lbs/hr)	Emissions (tons/yr)
1000	2.91	2.2E-04	0.04	0.17	3.1E-03	0.54	2.37
		Total for 6 lines		1.01			14.22

Methodology
Based on the MSDS provided by the source, the material used at the six (6) plastisol closure gasket curing line does not contain HAPs.
Although the material used at the six (6) plastisol closure gasket curing line contains negligible VOC, .
VOC Emission Factor is provided by the source (please note that the material used at the six (6) plastisol closure gasket curing line contains negligible VOC)
PM Emission Factors are from T177-27766-0000, issued on December 17, 2009.
Emissions (lbs/hr) = Maximum Production Rate (caps/minute) x 60 (min/hr) x Compound usage rate (lbs/1000 cap) x Emission Factor (lb / lb Compound) / 1000
Emissions (tons/yr) = Emissions (lbs/hr) x 8760 (hrs/yr) / 2000 (lbs/ton)

Appendix A: Emissions Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Silgan White Cap Corporation
Source Address: 1701 Williamsburg Pike, Richmond, Indiana 47374
Permit Number: F177-47153-00001
Reviewer: Alexandrea Neuzerling

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 Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	33.0	1.0	33.0	2.5	82.5	1200	0.227	7.5	2737.5
Vehicle (leaving plant) (one-way trip)	33.0	1.0	33.0	2.5	82.5	200	0.038	1.3	456.3
Vehicle (entering plant) (one-way trip)	10.0	1.0	10.0	2.5	25.0	200	0.038	0.4	138.3
Vehicle (leaving plant) (one-way trip)	10.0	1.0	10.0	2.5	25.0	200	0.038	0.4	138.3
Vehicle (entering plant) (one-way trip)	8.0	1.0	8.0	15.0	120.0	1700	0.322	2.6	940.2
Vehicle (leaving plant) (one-way trip)	8.0	1.0	8.0	15.0	120.0	1500	0.284	2.3	829.5
		Totals	102.0		455.0			14.4	5240.0

Average Vehicle Weight Per Trip = 4.5 tons/trip
Average Miles Per Trip = 0.14 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	4.5	4.5	4.5	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.400	0.080	0.0196	lb/mile
Mitigated Emission Factor, Eext =	0.365	0.073	0.0179	lb/mile

Process	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.50	0.10	0.02
Vehicle (leaving plant) (one-way trip)	0.08	0.02	0.00
Vehicle (entering plant) (one-way trip)	0.03	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.03	0.01	0.00
Vehicle (entering plant) (one-way trip)	0.17	0.03	0.01
Vehicle (leaving plant) (one-way trip)	0.15	0.03	0.01
Totals	**0.96**	**0.19**	**0.05**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

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Eric J. Holcomb, *Governor*
Brian C. Rockensuess, *Commissioner*

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Megan Bingenheimer
Silgan White Cap Corporation
1190 Corporate Center D45
Oconomowoc, WI 53066

DATE: July 3, 2024

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

SUBJECT: Final Decision
FESOP
177-47153-00001

This notice is to inform you that a final decision has been issued for the air permit application referenced above.

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. In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List and, if applicable, the Consultant/Agent and/or Responsible Official/Authorized Individual.

The final decision and supporting materials are available electronically; the original signature page is enclosed for your convenience. The final decision and supporting materials available electronically at:

IDEM's online searchable database: http://www.in.gov/apps/idem/caats/ . Choose Search Option **by Permit Number**, then enter permit 47153

and

IDEM's Virtual File Cabinet (VFC): https://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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, or have difficulty accessing the documents online, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 3, 2024

TO: Morrisson-Reeves Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Silgan White Cap Corporation
Permit Number: 177-47153-00001

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library 1/9/2017

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 3, 2024
Silgan White Cap Corporation
177-47153-00001

To: Interested Parties

This notice is to inform you that a final decision has been issued for the air permit application referenced above. This notice is for informational purposes only. You are not required to take any action.

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity.

The enclosed Notice of Decision Letter provides additional information about the final permit decision.

The final decision and supporting materials are available electronically at:

IDEM's online searchable database: http://www.in.gov/apps/idem/caats/ . Choose Search Option by Permit Number, then enter permit 47153

and

IDEM's Virtual File Cabinet (VFC): https://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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit.

Please Note: *If you 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
Final Interested Parties Cover Letter 10/13/2023

Mail Code 61-53

IDEM Staff	JLSCOTT 7/3/2024 Silgan White Cap Corporation 177-47153-00001 Final			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Megan Bingenheimer Silgan White Cap Corporation 1190 Corporate Center D45 Oconomowoc WI 53066 (Source CAATS) via UPS									
2		James Spurlock Plant Manager Silgan White Cap Corporation PO Box 488 Richmond IN 47375 *(RO CAATS)*									
3		Morrisson-Reeves Public Library 80 N 6th St Richmond IN 47374-3079 *(Library)*									
4		Richmond City Council and Mayors Office 50 N 5th St Richmond IN 47374 *(Local Official)*									
5		Wayne County Commissioners & Council 401 E Main St Richmond IN 47374 *(Local Official)*									
6		Mr. Randall Shrock 2764 Abington Pike Richmond IN 47374 *(Affected Party)*									
7		Wayne County Health Department 100 S 5th St Richmond IN 47374-4223 *(Health Department)*									
8		Whitewater Town Council 8165 SR 227 N Richmond IN 47374 *(Local Official)*									
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