



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 20 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Brian Thompson
Daramic, LLC
3430 Cline Road NW
Corydon, Indiana 47112

Re: Notice of Violation
Daramic, LLC
Corydon, IN

Dear Mr. Thompson:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Daramic, LLC (Daramic or you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Indiana State Implementation Plan and your Title V Permit at your Corydon, IN facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Cindy Schafer. You may call her at (312) 353-3018 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Nam" followed by a flourish.

Edward Nam
Acting Director
Air and Radiation Division

Enclosure

cc: Phil Perry, Chief, Air Compliance Branch, Indiana Department of Environmental
Management

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Daramic, LLC
Corydon, Indiana

Proceedings Pursuant to
Section 113(a)(1) of the
Clean Air Act, 42 U.S.C.
§ 7413(a)(1)

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NOTICE OF VIOLATION

EPA-5-16-IN-05

NOTICE OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). EPA finds that Daramic, LLC (Daramic or you) is violating the Indiana State Implementation Plan (SIP), as follows:

Statutory and Regulatory Background

1. The Clean Air Act (Act) is designed to, among other things, protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. Section 101(b)(1) of the Act, 42 U.S.C § 401(b)(1).
2. Pursuant to Section 502(a) of the Act, 42 U.S.C. § 7661a(a), it is unlawful for any person to, among other things, operate a major source subject to Title V except in compliance with a Title V permit after the effective date of any permit program approved or promulgated under Title V of the Act. EPA first promulgated regulations governing state operating permit programs on July 21, 1992. 57 Fed. Reg. 32295; 40 C.F.R. Part 70.
3. Section 502(a) of the Act, 42 U.S.C § 7661a(a), provides that after the effective date of any permit program approved or promulgated under Title V, it shall be unlawful for any person to violate any requirement of a permit issued under Title V.
4. EPA promulgated final interim approval of the Indiana Title V program on November 14, 1995, 60 Fed. Reg. 57188, and the program became effective on that date.
5. 40 C.F.R. § 70.7(b) provides that no source subject to 40 C.F.R. Part 70 requirements may operate without a permit as specified in the Act.
6. 326 Indiana Administrative Code (IAC) 2-7-2(a)(1) provides, in part, that a major source as defined in 326 IAC 2-7-1(22) is required to have a Part 70 permit.
7. 326 IAC 2-7-4(c)(3) provides, in part, that a Part 70 permit application shall describe all emissions of regulated air pollutants emitted from any emission unit.

8. 326 IAC 8-1-2 provides, in part, that one compliance method for controlling emissions of volatile organic compounds (VOCs) is to capture and route emissions of VOCs to a carbon adsorption system.
9. 326 IAC 8-1-6, provides that new facilities (as of January 1, 1980) that have potential emissions of VOCs greater than 25 tons per year and are located anywhere in the state of Indiana and are not otherwise regulated by other provisions of 326 IAC Article 8, 326 IAC 20-48, or 326 IAC 20-56 shall control emissions of VOCs using the best available control technology.
10. Daramic owns and operates a microporous polymeric battery separator production facility at 3430 Cline Road NW, Corydon, Indiana.
11. Emissions from Daramic's Sub-Micro (SM) Line 3, SM Line 4, and SM Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system, (smokehouse, Unit ID # 9.4), are subject to the best available control technology (BACT) requirements in the Indiana SIP at 326 IAC 8-1-6.
12. Title V Permit No. 061-31760-00012 requirement D.1.1(a) requires that VOC emissions during operation of the oil extraction systems for SM Line 3, SM Line 4 and SM Line 6 and related support equipment, consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4), be controlled by a carbon adsorption system (CAS) with an overall control efficiency of no less than 96%.
13. Title V Permit No. 061-31760-00012 requirement D.1.3(a) requires that the VOC emissions during operation of the oil extraction systems for SM Line 3, SM Line 4 and SM Line 6 and related support equipment consisting of storage tanks (Unit ID #s 11.1 through 11.6) and the recovery system (smokehouse, Unit ID # 9.4) be routed and controlled by a CAS.

Findings of Fact

14. On December 10, 2015, EPA inspectors conducted an on-site inspection of the Daramic facility. During the inspection, EPA inspectors observed VOC emissions exiting SM Line 3 using an infrared camera. Videos from the infrared camera indicate significant leakage of VOCs is occurring at SM Line 3. SM Line 3 was in operation during the inspection.

Violations

15. On January 18, 2016, Daramic violated the Indiana SIP at 326 IAC 8-1-6 by not meeting the BACT limit of 96% control efficiency for VOC emissions as established in Title V Permit No. 061-31760-00012.
16. On January 18, 2016, Daramic violated Condition D.1.1(a) in Title V Permit No. 061-31760-00012 by not achieving a control efficiency of at least 96% for VOC emissions routed to the CAS.

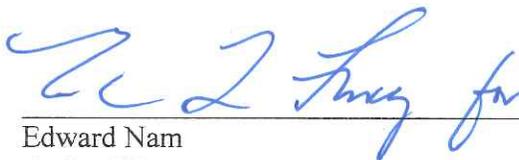
17. Daramic is violating the Indiana SIP at 326 IAC 8-1-2 by not capturing and routing emissions of VOCs from SM Line 3 to a CAS.
18. Daramic is violating Condition D.1.3(a) in Title V Permit No. 061-31760-00012 by not capturing and routing emissions of VOCs from SM Line 3 to the CAS as documented during the December 10, 2015 EPA inspection of the Corydon, Indiana facility.

Environmental Impact of Violations

19. These violations have caused or can cause excess emissions of VOCs, specifically trichloroethylene (TCE). Acute and chronic inhalation exposure to TCE can affect the human central nervous system. Symptoms of chronic inhalation exposure to TCE include nausea, blurred vision, facial numbness and weakness, effects on the liver, kidneys, immune system, reproductive system and endocrine system. TCE is a known carcinogen and a hazardous air pollutant. Several studies have reported exposure to TCE to be associated with several types of cancers including kidney, liver, cervix, and lymphatic system cancers.
20. Additionally, TCE is a photochemically reactive chlorinated solvent which can lead to the creation of ground-level ozone. Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame lung tissue. Repeated exposure may permanently scar lung tissue.

9/22/16

Date



Edward Nam
Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-16-IN-05, by

Certified Mail, Return Receipt Requested, to:

Brian Thompson, Environmental, Health
and Safety Manager
Daramic, LLC
3430 Cline Road NW
Corydon, Indiana 47112

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Phil Perry, Chief, Air Compliance Branch
Indiana Department of Environmental
Management
PPerry@idem.IN.gov

On the 21 day of September 2016.



Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70091680 0000 76740937