

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

**Prime PVC, Inc.
1400 North Washington Street
Marion, Indiana 46952**

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

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

Operation Permit No.: F053-7993-00053	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: September 29, 1997
First Significant FESOP Modification: SMF / ENSR 053-10315-00053	Pages Affected: 4,5, 26, 27, 28, 29
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates PVC resin mixing and extruding processes.

Responsible Official: Ed Snyder
Source Address: 1400 North Washington Street, Marion, IN 46952
Mailing Address: 1400 North Washington Street, Marion, IN 46952
Primary SIC Code: 3087
County Location: Grant
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, PSD Rules
Synthetic Minor Source, Part 70 Permit Program

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) Two (2) PVC resin mixing units, process identification P1, with a maximum rating of 4 tons per hour, using a baghouse as control, and exhausted at stack/Vent ID # S1;
- (b) One (1) polyvinyl chloride (PVC) resin receiving operation including four (4) silos identified as S₄ through S₇, each with a capacity of 60,000 pounds of resin and particulate matter controlled by baghouses identified as C₄ through C₇, exhausting through their separate stacks identified as S₄ through S₇;
- (c) One (1) Non Extruded PVC polymers mixing operation consisting of three surge hoppers and scales, connected to their separate mixers identified as #1 through # 3, with a combined maximum capacity of 12,137.56 pounds of PVC resin components per hour, 2670.26 pounds fillers per hour, 1092.38 and 242.75 pounds of modifiers and stabilizers per hour from tanks T₁ through T₁₂, 1335.13 pounds of whitners per hour, 145.65 pounds of wax per hour, 267.03 pounds of process aids per hour, 36.41 pounds of Lica 38 per hour, and 72.83 pounds of HRVP01 per hour at the mixers, particulate matter (PM) controlled by a MAC filter identified as C₃ and exhausting through a stack identified as S₃;
- (d) Three (3) Surge hoppers identified as S₈ through S₁₀, each with a maximum capacity of 6,000 pounds of Non Extruded Polymers per hour, particulate matter (PM) controlled by their separate baghouses identified as C₈ through C₁₀, exhausting their separate stack identified as S₈ through S₁₀;
- (e) One (1) PVC Extruder identified as CM-92C, receiving material from a Surge hoper # 8 through #10 via tote, particulate matter (PM) controlled by a baghouse identified as C₁₁, exhausting through a stack identified as S₁₁;
- (f) One (1) PVC Extruder identified as CM-92D, receiving material from a Surge hoper # 8

through #10 via tote, particulate matter (PM) controlled by a baghouse identified as C₁₂, exhausting through a stack identified as S₁₂;

- (g) One (1) PVC Extruder identified as CM-92E, receiving material from a Surge hopper # 8 through #10 via a tote, particulate matter (PM) controlled by a baghouse identified as C₁₃, exhausting through a stack identified as S₁₃;

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(20):

- (a) Activities or categories of activities with individual HAP emissions not previously identified. Any unit with potential, uncontrolled emissions greater than 1 pound/day but less than 5 pounds/day or 1 ton/ year of a single HAP (add description).
- (b) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (c) Combustion unit(s) flame safety purging on startup.
- (d) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (e) 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.
- (f) Filter or coalescer media changeout.
- (g) Grinding and machining operations using controls that have a grain loading ≤ 0.03 gr/actual cf and a gas flow rate ≤ 4000 actual cf/min including: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (h) Natural gas-fired combustion unit(s) with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Extrusion units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
- (l) Twelve (12) vertical fixed-roof dome tanks identified as T₁ through T₁₂, each with a diameter of 10 feet and volume of 8,000 gallons, containing PVC modifiers/ stabilizers of a maximum true vapor pressure of 1.16×10^{-7} pressure per square inch (PSI) at 68° F, annual throughput of 576,380 gallons per year.

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) Three (3) natural gas combustion units with a capacity of 0.13 MM Btu/hr each.
- (c) Twelve (12) vertical fixed-roof dome tanks identified as T₁ through T₁₂, each with a diameter of 10 feet and volume of 8,000 gallons, containing PVC modifiers/ stabilizers of a maximum true vapor pressure of 1.16×10^{-7} pressure per square inch (PSI) at 68° F, annual throughput of 576,380 gallons per year.

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

D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the three (3) 0.13 million Btu per hour heat input boiler shall be limited to 1.4 pounds per million Btu heat input.

This limitation is based on the following equation yielding the lowest limit, because the industry cannot identify the installation date other than prior to 1985:

326 IAC 6-2-4 :
 $Pt = 1.09/Q^{0.26}$

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16] [326 IAC 8-9-6]

D.2.3 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels: Record Keeping and Reporting Requirements)

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels: Record Keeping and Reporting Requirements),

- (a) The owner or operator of each tank (T₁ through T₁₂) subject to this rule shall keep all records required for three (3) years unless specified otherwise. Records required by subsection (b) shall be maintained for the life of the tanks.

- (b) The owner or operator of each tank (T₁ through T₁₂) shall maintain a record and submit to the department a report containing the following information for each tank:
- (1) The tank identification number
 - (2) The tank dimensions
 - (3) The tank capacity

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) One (1) polyvinyl chloride (PVC) resin receiving operation including four (4) silos identified as S₄ through S₇, each with a capacity of 60,000 pounds of resin and particulate matter controlled by baghouses identified as C₄ through C₇, exhausting through their separate stacks identified as S₄ through S₇;
- (b) One (1) Non Extruded PVC polymers mixing operation consisting of three surge hoppers and scales, connected to their separate mixers identified as #1 through # 3, with a combined maximum capacity of 12,137.56 pounds of PVC resin components per hour, 2670.26 pounds fillers per hour, 1092.38 and 242.75 pounds of modifiers and stabilizers per hour from tanks T₁ through T₁₂, 1335.13 pounds of whitners per hour, 145.65 pounds of wax per hour, 267.03 pounds of process aids per hour, 36.41 pounds of Lica 38 per hour, and 72.83 pounds of HRVP01 per hour at the mixers, particulate matter (PM) controlled by a MAC filter identified as C₃ and exhausting through a stack identified as S₃;
- (c) Three (3) Surge hoppers identified as S₈ through S₁₀, each with a maximum capacity of 6,000 pounds of Non Extruded Polymers per hour, particulate matter (PM) controlled by their separate baghouses identified as C₈ through C₁₀, exhausting their separate stack identified as S₈ through S₁₀;
- (d) One (1) PVC Extruder identified as CM-92C, receiving material from a Surge hoppers # 8 through #10 via tote, particulate matter (PM) controlled by a baghouse identified as C₁₁, exhausting through a stack identified as S₁₁;
- (e) One (1) PVC Extruder identified as CM-92D, receiving material from a Surge hoppers # 8 through #10 via tote, particulate matter (PM) controlled by a baghouse identified as C₁₂, exhausting through a stack identified as S₁₂;
- (f) One (1) PVC Extruder identified as CM-92E, receiving material from a Surge hoppers # 8 through #10 via tote, particulate matter (PM) controlled by a baghouse identified as C₁₃, exhausting through a stack identified as S₁₃;

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

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

- D.3.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.3.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.3.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
- D.3.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.3.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

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

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

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

- (l) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (m) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

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

D.3.6 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the following facilities shall not exceed the following associated particulate matter (PM) emissions:

Process/ Facility	Stack ID.	Throughput Limits (tons/hour)	PM /PM ₁₀ Emission Limits (lb./hr)
Unloading and Conveying to receiving silos (S4 through S7)	S ₄ through S ₇	60.0	46.30
Mixing & Weighing System (P3)			
Mixer # 1	S ₃	3.0	8.56

Mixer # 2	S ₃	3.0	8.56
Mixer # 3	S ₃	3.0	8.56
Surge Hopper System			
Surge Hopper # S8	S ₈	3.0	8.56
Surge Hopper # S9	S ₉	3.0	8.56
Surge Hopper # S10	S ₁₀	3.0	8.56
Polymer Extruders			
Tote Transfer & Extruder # CM-92C	S ₁₁	3.0	8.56
Tote Transfer & Extruder # CM-92D	S ₁₂	3.0	8.56
Tote Transfer & Extruder # CM-92E	S ₁₃	3.0	8.56

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the facilities identified as One (1) resin receiving operation, PVC mixing operation, three (3) surge hoppers and their respective bag houses identified as C₄ through C₇, Mac filter C₃, C₈ through C₁₀.

Compliance Determination Requirements

D.3.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM / PM₁₀ limit specified in Condition D.1.A.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.3.9 Particulate Matter (PM)

The baghouses identified as C₃, C₄ through C₇, C₈ through C₁₀, C₁₁ through C₁₃ for PM control shall be in operation at all times when the facilities identified as resin receiving operation, polymers mixing operation, surge hoppers, and tote transfers & extruders are in operation and exhausting to the outside atmosphere.

D.3. 10 Visible Emissions Notations

- (a) Daily visible emission notations of the facilities identified as resin receiving operation, and polymers mixing operation stack exhaust (S_3 , S_4 through S_7) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the facilities identified as resin receiving operation, polymers mixing operation, surge hoppers, and tote transfers & extruders, at least once weekly when the respective facility is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.0 and 15.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

D.3. 12 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.13 Record Keeping Requirements

- (a) To document compliance with Condition D.3.10, the Permittee shall maintain records of daily visible emission notations of the facilities identified as resin receiving operation, polymers mixing operation, surge hoppers, and tote transfers & extruders stack exhaust (S₃, S₄ through S₇, S₈ through S₁₀, S₁₁ through S₁₃).
- (b) To document compliance with Condition D.3.11, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Prime PVC, Inc.
Source Address: 1400 North Washington Street, Marion, IN 46952
Mailing Address: 1400 North Washington Street, Marion, IN 46952
FESOP No.: F053-7993-00053

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Prime PVC, Inc.
Source Address: 1400 North Washington Street, Marion, IN 46952
Mailing Address: 1400 North Washington Street, Marion, IN 46952
FESOP No.: F053-7993-00053

This form consists of 2 pages

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

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

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

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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