



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 5, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Chemtrusion Indiana, Inc. / F 019-17197-00091

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

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 enclosed matter. 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 Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, 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 Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA 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 OEA 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.

Enclosures
FNPER.dot 9/16/03



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

**Chemtrusion Indiana, Inc.
1403 Port Road
Jeffersonville, Indiana 47130**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and 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.

Operation Permit No.: F 019-17197-00091	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 5, 2004 Expiration Date: October 5, 2009

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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 custom resin compounding source.

Authorized individual:	Site Manager
Source Address:	1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address:	1403 Port Road, Jeffersonville, Indiana 47130
General Source Phone:	(812) 280-2910
SIC Code:	3087
Source Location Status:	Clark
	Nonattainment for ozone under the 8-hour standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD and Nonattainment NSR Rules
	Minor Source, Section 112 of the Clean Air Act

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) Three (3) preblending operations, identified as PB1 through PB3, constructed in 1998, equipped with a dust collector (PS010) for particulate control, exhausting to Stack B, capacity: 165 pounds of additives and pigments per hour, total.
- (b) One (1) preblending operation, identified as PB4, constructed in 2000, equipped with a dust collector (PS012) for particulate control, exhausting to Stack H, capacity: 165 pounds of additives and pigments per hour.
- (c) One (1) automated feeder system, identified as AFS, constructed in 1998, equipped with a dust collector (PS009) for particulate control, exhausting to Stack A, input capacity: 80 pounds of additive, 80 pounds of pigments, 10,450 pounds of polypropylene resin, 3,215 pounds of rubber, and 2,250 pounds of fillers per hour.
- (d) One (1) automated feeder system, identified as AFS2, constructed in 2000, equipped with a dust collector (PS011) for particulate control, exhausting to Stack G, input capacity: 75 pounds of additive, 75 pounds of pigments, 9,900 pounds of polypropylene resin, 3,100 pounds of rubber, and 2,100 pounds of fillers per hour.
- (e) One (1) extruder, identified as EX1B, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 330 pounds per hour.
- (f) One (1) extruder, identified as EX2, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 1,500 pounds per hour.

- (g) One (1) extruder, identified as EX3, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 1,500 pounds per hour.
- (h) One (1) extruder, identified as EX4, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 3,500 pounds per hour.
- (i) One (1) extruder, identified as EX5, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 4,000 pounds per hour.
- (j) One (1) extruder, identified as EX6, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 6,000 pounds per hour.
- (k) One (1) extruder, identified as EX7, equipped with different heat zones for polymerization of raw materials, exhausting through the general ventilation, constructed in 2000, capacity: 12,000 pounds per hour.
- (l) One (1) extruder, identified as EX8, equipped with different heat zones for polymerization of raw materials, exhausting through the general ventilation, constructed in 2000, capacity: 3,000 pounds per hour.
- (m) One (1) pelletizing process, identified as P1, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 330 pounds of polymerized plastic in a water bath per hour.
- (n) Two (2) pelletizing processes, identified as P2 and P3, both equipped with centrifugals to remove moisture contents, constructed in 1998, capacity: 1,500 pounds of polymerized plastic in a water bath per hour, each.
- (o) One (1) pelletizing process identified as P4, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 3,500 pounds of polymerized plastic in a water bath per hour.
- (p) One (1) pelletizing process identified as P5, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 4,000 pounds of polymerized plastic in a water bath per hour.
- (q) One (1) pelletizing process identified as P6, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 6,000 pounds of polymerized plastic in a water bath per hour.
- (r) One (1) pelletizing process identified as P7, equipped with a centrifugal to remove moisture contents, constructed in 2000, exhausting through the general ventilation, capacity: 12,000 pounds of polymerized plastic in a water bath per hour.
- (s) One (1) pelletizing process identified as P8, equipped with a centrifugal to remove moisture contents, constructed in 2000, exhausting through the general ventilation, capacity: 3,000 pounds of polymerized plastic in a water bath per hour.

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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - Three (3) process heaters, identified as OF1 through OF3, rated at 1.20 million British thermal units per hour, each.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF); or
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) Noncontact cooling tower systems as follows:
 - Forced and induced draft cooling tower system not regulated under a NESHAP.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Conveyors as follows:
 - Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) Other activities or categories not previously identified:
 - (1) Diesel track mobile
 - (2) Plate blend silo

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) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

by this permit.

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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.

B.2 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.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit 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.

B.4 Enforceability [326 IAC 2-8-6]

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 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.6 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.7 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.8 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. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.9 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.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (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, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 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 describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

- (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 Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "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) 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.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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 FESOP 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 the certification by the "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(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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.
- (2) If IDEM, OAQ, upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 in writing by IDEM, OAQ any additional information identified as 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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 this source that are described in 326 IAC 2-8-15(b) through (d), without 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 emissions allowable under 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to 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)(2), (c)(1), and (d).

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

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-17-3-2] [IC13-30-3-1]

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] [IC 13-17-3-2]

- (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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "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, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions 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) 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 the source's potential to emit does not exceed the above specified limits.
- (c) 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 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

C.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(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 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(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 by the "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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "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 certification by the "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.10 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] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (" 2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (" 2%) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 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.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 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 take appropriate response actions. The Permittee shall submit a descrip-

tion of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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 the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 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. 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 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. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Three (3) preblending operations, identified as PB1 through PB3, constructed in 1998, equipped with a dust collector (PS010) for particulate control, exhausting to Stack B, capacity: 165 pounds of additives and pigments per hour, total.
- (b) One (1) preblending operation, identified as PB4, constructed in 2000, equipped with a dust collector (PS012) for particulate control, exhausting to Stack H, capacity: 165 pounds of additives and pigments per hour.
- (c) One (1) automated feeder system, identified as AFS, constructed in 1998, equipped with a dust collector (PS009) for particulate control, exhausting to Stack A, input capacity: 80 pounds of additive, 80 pounds of pigments, 10,450 pounds of polypropylene resin, 3,215 pounds of rubber, and 2,250 pounds of fillers per hour.
- (d) One (1) automated feeder system, identified as AFS2, constructed in 2000, equipped with a dust collector (PS011) for particulate control, exhausting to Stack G, input capacity: 75 pounds of additive, 75 pounds of pigments, 9,900 pounds of polypropylene resin, 3,100 pounds of rubber, and 2,100 pounds of fillers per hour.
- (e) One (1) extruder, identified as EX1B, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 330 pounds per hour.
- (f) One (1) extruder, identified as EX2, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 1,500 pounds per hour.
- (g) One (1) extruder, identified as EX3, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 1,500 pounds per hour.
- (h) One (1) extruder, identified as EX4, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 3,500 pounds per hour.
- (i) One (1) extruder, identified as EX5, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 4,000 pounds per hour.
- (j) One (1) extruder, identified as EX6, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 6,000 pounds per hour.
- (k) One (1) extruder, identified as EX7, equipped with different heat zones for polymerization of raw materials, exhausting through the general ventilation, constructed in 2000, capacity: 12,000 pounds per hour.
- (l) One (1) extruder, identified as EX8, equipped with different heat zones for polymerization of raw materials, exhausting through the general ventilation, constructed in 2000, capacity: 3,000 pounds per hour.
- (m) One (1) pelletizing process, identified as P1, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 330 pounds of polymerized plastic in a water bath per hour.

- (n) Two (2) pelletizing processes, identified as P2 and P3, both equipped with centrifugals to remove moisture contents, constructed in 1998, capacity: 1,500 pounds of polymerized plastic in a water bath per hour, each.
- (o) One (1) pelletizing process identified as P4, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 3,500 pounds of polymerized plastic in a water bath per hour.
- (p) One (1) pelletizing process identified as P5, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 4,000 pounds of polymerized plastic in a water bath per hour.
- (q) One (1) pelletizing process identified as P6, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 6,000 pounds of polymerized plastic in a water bath per hour.
- (r) One (1) pelletizing process identified as P7, equipped with a centrifugal to remove moisture contents, constructed in 2000, exhausting through the general ventilation, capacity: 12,000 pounds of polymerized plastic in a water bath per hour.
- (s) One (1) pelletizing process identified as P8, equipped with a centrifugal to remove moisture contents, constructed in 2000, exhausting through the general ventilation, capacity: 3,000 pounds of polymerized plastic in a water bath per hour.

(The information describing the process contained in this facility 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 8-1-6]

Pursuant to First Significant Permit Revision 019-9668-00091, issued on June 15, 2000, the input of raw materials to the one (1) extruder, identified as EX7, shall be limited to less than 49,932 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The potential to emit VOC from the one (1) extruder, identified as EX7, shall not exceed 1.0 pound per ton of raw materials. This limits the potential to emit VOC from the one (1) extruder, identified as EX7, to less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

D.1.2 FESOP Minor Limit [326 IAC 2-8]

Pursuant to 326 IAC 2-8, the potential to emit PM₁₀ from the automated feeder systems (AFS and AFS2) shall not exceed 1.42 pounds per ton of material throughput. Based on the maximum potential material throughput of 8.0375 tons per hour at AFS and 7.625 tons per hour at AFS2, this limitation would limit the potential to emit PM₁₀ to 95.5 tons per year from the two (2) automated feeder systems (AFS and AFS2) and less than 100 tons per year from the entire source. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-1-2]

- (a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the eight (8) extruders and eight (8) pelletizing operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)) of exhaust air.

- (b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the three (3) preblending operations (PB1 through PB3), all exhausting to the same dust collector (PS010), shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)) of exhaust air.
- (c) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the one (1) preblending operation (PB4) exhausting to a dust collector (PS012) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)) of exhaust air.
- (d) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the one (1) automated feeder system (AFS) exhausting to a dust collector (PS009) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)) of exhaust air.
- (e) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the one (1) automated feeder system (AFS2) exhausting to a dust collector (PS011) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)) of exhaust air.

D.1.4 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 two (2) automated feeder systems (AFS and AFS2) and their control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this FESOP, in order to demonstrate compliance with Conditions D.1.2 and D.1.3, the Permittee shall perform PM and PM₁₀ testing for the one (1) automated feeder system (AFS) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.6 Particulate Control

- (a) Pursuant to FESOP 019-9668-00091 issued on November 9, 1998, and in order to comply with Conditions D.1.2 and D.1.3, the dust collector (PS009) for particulate control shall be in operation and control emissions from the automated feeder system (AFS) at all times that the automated feeder system is in operation.
- (b) Pursuant to Significant Permit Revision 019-11926-00091 issued on June 15, 2001, and in order to comply with Conditions D.1.2 and D.1.3, the dust collector (PS011) for particulate control shall be in operation and control emissions from the automated feeder system at all times that the automated feeder system is in operation.

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

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the automated feeder systems (AFS and AFS2) stacks exhausts (Stacks A and G) shall be performed once per shift 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. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collectors (PS009 and PS011) used in conjunction with the automated feeder systems (AFS and AFS2), at least once per shift when the process is in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.9 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all filters controlling the automated feeder systems (AFS and AFS2). Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.

D.1.10 Dust Collector Failure Detection

In the event that a dust collector failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business 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) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment units, if failure is indicated, then 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.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the material throughput at the one (1) extruder, identified as EX7, on a monthly basis
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the automated feeder systems (AFS and AFS2) stacks exhausts (Stacks A and G) once per shift.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records once per shift of the total static pressure drop.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9.
- (e) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

Three (3) process heaters, identified as OF1 through OF3, rated at 1.20 million British thermal units per hour, each.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) Noncontact cooling tower systems as follows:

Forced and induced draft cooling tower system not regulated under a NESHAP.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Conveyors as follows:

Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) Other activities or categories not previously identified:
 - (1) Diesel track mobile
 - (2) Plate blend silo

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

There are no rules specifically applicable to these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

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

Source Name: Chemtrusion Indiana, Inc.
Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
FESOP No.: 019-17197-00091

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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
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 OCCURRENCE REPORT**

Source Name: Chemtrusion Indiana, Inc.
Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
FESOP No.: 019-17197-00091

This form consists of 2 pages

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- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
|---|

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 Describe:
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: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Chemtrusion Indiana, Inc.
Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
FESOP No.: 019-17197-00091
Facility: One (1) extruder (EX7)
Parameter: Material input
Limit: Less than 49,932 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Material Input (tons)	Material Input (tons)	Material Input (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Chemtrusion Indiana, Inc.
Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
FESOP No.: 019-17197-00091

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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: _____

A certification is not required for this report.

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit
(FESOP) Renewal

Source Background and Description

Source Name:	Chemtrusion Indiana, Inc.
Source Location:	1403 Port Road, Jeffersonville, Indiana 47130
County:	Clark
SIC Code:	3087
Operation Permit No.:	019-9668-00091
Operation Permit Issuance Date:	November 9, 1998
Permit Renewal No.:	019-17197-00091
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Chemtrusion Indiana, Inc. relating to the operation of a custom resin compounding source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Three (3) preblending operations, identified as PB1 through PB3, constructed in 1998, equipped with a dust collector (PS010) for particulate control, exhausting to Stack B, capacity: 165 pounds of additives and pigments per hour, total.
- (b) One (1) preblending operation, identified as PB4, constructed in 2000, equipped with a dust collector (PS012) for particulate control, exhausting to Stack H, capacity: 165 pounds of additives and pigments per hour.
- (c) One (1) automated feeder system, identified as AFS, constructed in 1998, equipped with a dust collector (PS009) for particulate control, exhausting to Stack A, input capacity: 80 pounds of additive, 80 pounds of pigments, 10,450 pounds of polypropylene resin, 3,215 pounds of rubber, and 2,250 pounds of fillers per hour.
- (d) One (1) automated feeder system, identified as AFS2, constructed in 2000, equipped with a dust collector (PS011) for particulate control, exhausting to Stack G, input capacity: 75 pounds of additive, 75 pounds of pigments, 9,900 pounds of polypropylene resin, 3,100 pounds of rubber, and 2,100 pounds of fillers per hour.
- (e) One (1) extruder, identified as EX1B, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 330 pounds per hour.
- (f) One (1) extruder, identified as EX2, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 1,500 pounds per hour.
- (g) One (1) extruder, identified as EX3, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 1,500 pounds per hour.

- (h) One (1) extruder, identified as EX4, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 3,500 pounds per hour.
- (i) One (1) extruder, identified as EX5, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 4,000 pounds per hour.
- (j) One (1) extruder, identified as EX6, equipped with different heat zones for polymerization of raw materials, constructed in 1998, exhausting to Stack E, capacity: 6,000 pounds per hour.
- (k) One (1) extruder, identified as EX7, equipped with different heat zones for polymerization of raw materials, exhausting through the general ventilation, constructed in 2000, capacity: 12,000 pounds per hour.
- (l) One (1) extruder, identified as EX8, equipped with different heat zones for polymerization of raw materials, exhausting through the general ventilation, constructed in 2000, capacity: 3,000 pounds per hour.
- (m) One (1) pelletizing process, identified as P1, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 330 pounds of polymerized plastic in a water bath per hour.
- (n) Two (2) pelletizing processes, identified as P2 and P3, both equipped with centrifugals to remove moisture contents, constructed in 1998, capacity: 1,500 pounds of polymerized plastic in a water bath per hour, each.
- (o) One (1) pelletizing process identified as P4, equipped with a centrifugal to remove moisture contents, constructed in 1998, capacity: 3,500 pounds of polymerized plastic in a water bath per hour.
- (p) One (1) pelletizing process identified as P5, equipped with a centrifugal to remove moisture contents, constructed in 1998, exhausting to Stack F, capacity: 4,000 pounds of polymerized plastic in a water bath per hour.
- (q) One (1) pelletizing process identified as P6, equipped with a centrifugal to remove moisture contents, constructed in 1998, exhausting to Stack F, capacity: 6,000 pounds of polymerized plastic in a water bath per hour.
- (r) One (1) pelletizing process identified as P7, equipped with a centrifugal to remove moisture contents, constructed in 2000, exhausting through the general ventilation, capacity: 12,000 pounds of polymerized plastic in a water bath per hour.
- (s) One (1) pelletizing process identified as P8, equipped with a centrifugal to remove moisture contents, constructed in 2000, exhausting through the general ventilation, capacity: 3,000 pounds of polymerized plastic in a water bath per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new proposed emission units during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - Three (3) process heaters, identified as OF1 through OF3, rated at 1.20 million British thermal units per hour, each.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF); or
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) Noncontact cooling tower systems as follows:
 - Forced and induced draft cooling tower system not regulated under a NESHAP.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Conveyors as follows:
 - Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) Other activities or categories not previously identified:
 - (1) Diesel track mobile
 - (2) Plate blend silo

Existing Approvals

The source has been operating under the previous FESOP 019-9668-00091 issued on November 9, 1998, and the following amendments and revisions:

- (a) First Significant Permit Revision 019-11926-00091 issued on June 15, 2000
- (b) First Reopening 019-13018-00091 issued on September 24, 2001

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) First Significant Permit Revision 019-11926-00091 issued on June 15, 2000

Condition D.1.1: Pursuant to 326 IAC 2-7 (Part 70 Program) and 326 IAC 6-3 (Process Operation), the following facilities shall have an allowable PM emission limits:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour, the following equation is used:

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

Process / Facility	Process Weight Rate (tons/hour)	Truncated PM Allowable Emissions (lbs./hr)	PM ₁₀ Allowable Emissions (lbs./hr)
Preblending Operation (PB1)	0.0825	0.22	0.22
Preblending Operation (PB2)	0.0825	0.22	0.22
Preblending Operation (PB3)	0.0825	0.22	0.22
Automatic Feeder System (AFS)	8.03	4.07	4.07
Pelletizing Operation (P1)	0.165	0.14	0.14
Pelletizing Operation (P2)	0.75	0.65	0.65
Pelletizing Operation (P3)	0.75	0.65	0.65
Pelletizing Operation (P4)	1.75	1.50	1.50
Pelletizing Operation (P5)	1.65	1.42	1.42
Pelletizing Operation (P)	3.0	2.59	2.59

The above PM emission limits shall also equivalent to PM₁₀ emission limits. Compliance with this condition will make 326 IAC 2-7 (Part 70 Program) requirements not applicable.

And

Condition D.3.2: Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the following facilities shall not exceed the following pounds per hour limitations when operating at the process weight rate indicated:

Process / Facility	Process Weight Rate (tons/hr)	PM Allowable Emissions (lbs./hr)
Preblending Operation (PB4)	0.09	0.80
Preblending Operation (PB5)	0.09	0.80
Automatic Feeder System (AFS2)	7.65	16.0
Pelletizing Operation (P7)	6.00	13.6
Pelletizing Operation (P8)	1.65	5.73

These limitations are based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour, the following equation is used:

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

Reason not incorporated: This source is located in Clark County and the potential to emit PM is greater than 100 tons per year. Therefore, the requirements of 326 IAC 6-1 are applicable, and pursuant to 326 IAC 6-3-1(c)(3), the facilities are exempt from the requirements of 326 IAC 6-3.

- (b) First Significant Permit Revision 019-11926-00091 issued on June 15, 2000

Condition D.3.1: Pursuant to 326 IAC 2-8 (FESOP), the PM₁₀ from the following facilities shall be limited as follows:

Process / Facility	PM ₁₀ Limited Emissions (lbs/hr)
Preblending Operation (PB4)	0.22
Preblending Operation (PB5)	0.22
Automatic Feeder System (AFS2)	3.88
Pelletizing Operation (P7)	5.17
Pelletizing Operation (P8)	1.42

Compliance with this condition will make the requirements of 326 IAC 2-7 (Part 70 Program) not applicable.

Reason not incorporated: The limitations in this permit have been revised so that only the emissions from the automated feeder systems are limited in order to make 326 IAC 2-7, Part 70, not applicable. That limit has been changed to a pound per ton emission limit based on the worst-case material throughput.

- (c) First Significant Permit Revision 019-11926-00091 issued on June 15, 2000

Condition D.1.3: The baghouses identified as PS009 and PS010 for PM control shall be in operation at all times when the preblending operation (PB1, PB2, PB3) and automatic feeder system (AFS) are in operation and exhausting to the outside atmosphere.

Reason not incorporated: The dust collector identified as PS009 must still operate at all times when the automated feeder system (AFS) is in operation in order to comply with the limitations in the permit. However, operation of the other dust collector (identified as PS010) is not required in order for the preblending operations (PB1, PB2 and PB3) to comply with any rules or limitations. Therefore, the monitoring requirements for the preblending operations in Conditions D.1.4 and D.1.5 are also not incorporated.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on February 7, 2003. Additional information was received on November 10, 2003, and May 3, 2004.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See page 1 of Appendix A of this document for detailed emission calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	209
PM ₁₀	105
SO ₂	1.00
VOC	96.1
CO	5.00
NO _x	5.00

HAPs	Unrestricted Potential Emissions (tons/yr)
HAPs from Combustion	0.01
Total	0.01

This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its potential to emit to below the Title V emission levels. Therefore, this source has been issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8, and that permit is being renewed.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of the FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Preblending Operations	2.16	1.44	-	0.5	-	-	-
Automated Feeder Systems	206 (49.6)	95.5 (49.6)	-	-	-	-	-
Extruders	-	-	-	< 68.4	-	-	-
Pelletizing Operations	-	-	-	4.78	-	-	-
Insignificant Activities	1.00	1.00	1.00	5.00	5.00	5.00	0.01
Total Emissions	209 (52.8)	97.9 (52.0)	1.00	< 78.7	5.00	5.00	0.01

The values in the table represent the unrestricted potential emissions except for the value for PM₁₀ from the Automated Feeder Systems which is limited by 326 IAC 2-8 and the value for VOC from the extruders since the potential to emit VOC from one (1) extruder (EX7) is limited in order to make 326 IAC 8-1-6 not applicable. The values in parenthesis, represent the potential to emit considering the 326 IAC 6-1 limits and the flow rates provided in the application. See the *State Rule Applicability - Entire Source* section of this document for details about those limitations.

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	maintenance attainment
8-Hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) 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 the ozone standards. Clark County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Clark County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) This source is a compounding source that processes, but does not manufacture polypropylene resins. Therefore, this source is not subject to the requirements of 40 CFR 60,

Subpart DDD, Standards of Performance for VOC Emissions from the Polymer Manufacturing Industry.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) This source does not process or manufacture an elastomer product as defined by 40 CFR 63.482. Therefore, the requirements of 40 CFR 63, Subpart U, are not applicable.
- (d) This source does not process or manufacture a thermoplastic product as defined by 40 CFR 63.1312. Therefore, the requirements of 40 CFR 63, Subpart JJ, are not applicable.
- (e) This source is a resin compounding source. The source does not produce plastic composites, and does not use resins containing styrene. Therefore, the requirements of 40 CFR 63, Subpart WWWW, are not applicable.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 20 and 40 CFR Parts 61 and 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

- (a) This source, constructed in 1998, is not one (1) of the twenty-eight (28) listed source categories. The unrestricted potential emissions of each criteria pollutant from this source are less than 250 tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-2, PSD.
- (b) The initial source, constructed in 1998, had unrestricted potential emissions of each criteria pollutant less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, were not applicable.
- (c) The modification constructed in 2000 had unrestricted potential emissions of each criteria pollutant less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, were not applicable.

326 IAC 2-1.1-5 (Air quality requirements)

This source is in an area that has been designated as basic nonattainment for the eight hour ozone standard. The unrestricted potential VOC and NO_x emissions are less than 100 tons per year. Therefore, this source is also a minor source pursuant to 326 IAC 2-1.1-5 for nonattainment new source review.

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 of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8 (FESOP)

The unrestricted potential PM₁₀ emissions from all facilities at this source other than the two (2) automated feeder systems is 2.44 tons per year, including a conservative estimate of 1.00 ton per year from insignificant activities. The potential to emit PM₁₀ from the automated feeder systems

(AFS and AFS2) shall not exceed 1.42 pounds per ton of material throughput. Based on the maximum potential material throughput of 8.0375 tons per hour at AFS and 7.625 tons per hour at AFS2, this limitation would limit the potential to emit PM₁₀ to 95.5 tons per year from the two (2) automated feeder systems (AFS and AFS2) and less than 100 tons per year from the entire source. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead, and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-1 (County Specific Particulate Matter Limitations)

This source is located in Clark County, but is not specifically listed in 326 IAC 6-1-8.1 through 18. The potential to emit PM is greater than 100 tons per year. Therefore, the requirements of 326 IAC 6-1-2(a) are applicable.

- (a) Pursuant to 326 IAC 6-1-2(a), the particulate matter emissions from the eight (8) extruders and eight (8) pelletizing operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). The eight (8) extruders and eight (8) pelletizing operations do not have the potential to emit particulate. Therefore, they will comply with the requirements of this rule.
- (b) Pursuant to 326 IAC 6-1-2(a), the particulate matter emissions from the three (3) preblending operations (PB1 through PB3) all exhausting to the same dust collector (PS010) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). Based on a flow rate of 7,600 dscfm at the dust collector, this is equivalent to an emission rate of 1.95 pounds per hour (0.03 grains/dscf x 7,600 dscfm x 60 min/hr x 1 lb/7,000 grains = 1.95 lbs/hr). Since the unrestricted potential emissions from the three (3) preblending operations (PB1 through PB3) are 0.248 pound per hour, the three (3) preblending operations (PB1 through PB3) will comply with this rule.
- (c) Pursuant to 326 IAC 6-1-2(a), the particulate matter emissions from the one (1) preblending operation (PB4) exhausting to a dust collector (PS012) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). Based on a flow rate of 1,500 dscfm at the dust

collector, this is equivalent to an emission rate of 1.95 pounds per hour (0.03 grains/dscf x 1,500 dscfm x 60 min/hr x 1 lb/7,000 grains = 0.386 lbs/hr). Since the unrestricted potential emissions from the preblending operation (PB4) are 0.248 pound per hour, the preblending operation (PB4) will comply with this rule.

- (d) Pursuant to 326 IAC 6-1-2(a), the particulate matter emissions from the one (1) automated feeder system (AFS) exhausting to a dust collector (PS009) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). Based on a flow rate of 22,000 dscfm at the dust collector, this is equivalent to an emission rate of 5.66 pounds per hour (0.03 grains/dscf x 22,000 dscfm x 60 min/hr x 1 lb/7,000 grains = 5.66 lbs/hr). Since the potential emissions from the one (1) automated feeder system (AFS) after control by the dust collector are 0.024 pound per hour, the one (1) automated feeder system will comply with this rule. Operation of the dust collector at all times is required in order for this facility to comply with this rule.
- (e) Pursuant to 326 IAC 6-1-2(a), the particulate matter emissions from the one (1) automated feeder system (AFS2) exhausting to a dust collector (PS011) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). Based on a flow rate of 22,000 dscfm at the dust collector, this is equivalent to an emission rate of 5.66 pounds per hour (0.03 grains/dscf x 22,000 dscfm x 60 min/hr x 1 lb/7,000 grains = 5.66 lbs/hr). Since the potential emissions from the one (1) automated feeder system (AFS2) after control by the dust collector are 0.023 pound per hour, the one (1) automated feeder system will comply with this rule. Operation of the dust collector at all times is required in order for this facility to comply with this rule.

State Rule Applicability – Individual Facilities

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

- (a) Pursuant to the First Significant Permit Revision, 019-9668-00091, issued on June 15, 2000, the input of raw materials to the one (1) extruder, identified as EX7, is limited to less than 49,932 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The potential to emit VOC from the one (1) extruder, identified as EX7, shall not exceed 1.0 pound per ton of raw materials. This limits the potential to emit VOC from the one (1) extruder, identified as EX7, to less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (b) The unrestricted potential VOC emissions from each other facility at this source are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

Testing Requirements

PM₁₀ testing of the automated feeder system (AFS) was required by F 019-9668-00091, issued on November 9, 1998, during the period between 12 and 18 months after issuance of that permit. That test was required because the unrestricted potential emissions from that unit were a significant portion of the potential emissions from the entire source. On November 25, 1998, Chemtrusion, Inc. appealed that condition in the permit, but the appeal was never resolved. In this renewal PM and PM₁₀ testing of the automated feeder system is required since the potential PM emissions from that unit are 50.7% of the source-wide potential PM emissions and the potential PM₁₀ emissions are 50.8% of the source-wide potential PM₁₀ emissions. Since the two (2) auto-

mated feeder systems at this source handle the same types of materials and perform the same process, only one (1) system must be tested. This test is required to determine compliance with 326 IAC 2-8 and 326 IAC 6-1.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The two (2) automated feeder systems have applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the automated feeder systems (AFS and AFS2) stacks exhausts (Stacks A and G) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain trouble-shooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) The Permittee shall record the total static pressure drop across the dust collectors (PS009 and PS011) used in conjunction with the automated feeder systems (AFS and AFS2), at least once per shift when the process is in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take

response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

- (c) An inspection shall be performed each calendar quarter of all filters controlling the automated feeder systems (AFS and AFS2). Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.
- (d) In the event that a dust collector failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business 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) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (2) For single compartment units, if failure is indicated, then 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).

These monitoring conditions are necessary because the dust collectors must operate properly to ensure compliance with 326 IAC 6-1 and 326 IAC 2-8.

Conclusion

The operation of this custom resin compounding source shall be subject to the conditions of the FESOP 019-17197-00091.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: Chemtrusion Indiana, Inc.
Source Location: 1403 Port Road, Jeffersonville, Indiana 47130
County: Clark
FESOP Renewal: F 019-17197-00091
SIC Code: 3087
Permit Reviewer: CarrieAnn Paukowits

On July 21, 2004, the Office of Air Quality (OAQ) had a notice published in the Evening News, Jeffersonville, Indiana, stating that Chemtrusion Indiana, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to continue to operate a custom resin compounding source with dust collectors as control. The notice also stated that OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On August 26, 2004, Evelyn Crooks of Environmental Compliance Source, Ltd., on behalf of Chemtrusion Indiana, Inc., submitted comments on the proposed FESOP. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**):

Comment 1:

In Sections A(p) and A(q) and Sections D.1(p) and D.1(q) of the permit the pelletizing units P5 and P6 are shown as exhausting to Stack F. This is a typo. The language was corrected to show no stack in the original permit. These units have never been connected to an exhaust stack. Please note that the other pelletizers, P1 through P4, P7, and P8 do not connect to exhaust stacks. All units perform essentially the same function on their respective production lines.

Response 1:

Items (p) and (q) of Condition A.2 and the Facility Description Box in Section D.1 have been revised as follows:

- (p) One (1) pelletizing process identified as P5, equipped with a centrifugal to remove moisture contents, constructed in 1998, ~~exhausting to Stack F~~, capacity: 4,000 pounds of polymerized plastic in a water bath per hour.
- (q) One (1) pelletizing process identified as P6, equipped with a centrifugal to remove moisture contents, constructed in 1998, ~~exhausting to Stack F~~, capacity: 6,000 pounds of polymerized plastic in a water bath per hour.

Comment 2:

Condition D.1.5 requires the stack test to include condensable PM₁₀. At this point in the process there is no heat involved. A condensable PM₁₀ test would be inappropriate and we request that this requirement be changed to filterable PM₁₀ only.

Response 2:

It has been noted that this source does not expect condensible PM₁₀ from the Automated Feeder Systems. However, the decision to include or omit condensibles will be made by the Compliance Data Section during the protocol submittal/review period. Therefore, there are no changes to Condition D.1.5.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named twenty-three (23) Indiana counties and one (1) partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Clark County has been designated as basic nonattainment for the 8-hour ozone standard. As stated in the Technical Support Document, the unrestricted potential VOC and NO_x emissions are less than 100 tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-1.1-5 for nonattainment new source review. The county attainment status is correct in the Technical Support Document, but has been corrected in Section A.1, General Information, as follows:

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

The Permittee owns and operates a stationary custom resin compounding source.

Authorized individual: Site Manager
Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
General Source Phone: (812) 280-2910
SIC Code: 3087
Source Location Status: Clark
Nonattainment for ozone under the 8-hour standard
Attainment for all **other** criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD and Nonattainment NSR Rules
Minor Source, Section 112 of the Clean Air Act

Appendix A: Emission Calculations

Company Name: Chemtrusion Indiana, Inc.
Address City IN Zip: 1403 Port Road, Jeffersonville, Indiana 47130
FESOP: 019-17197-00091
Reviewer: CarrieAnn Paukowits
Date: February 7, 2003

Process	SCC	Throughput in tons/hr	Emission Factors in lbs/ton of Product			Potential emissions (lbs/hr)			Potential emissions (tons/year)			C.E. for PM and PM10	Controlled Emissions in lbs/hr		Controlled Emissions in tons/year	
			PM	PM10	VOC	PM	PM10	VOC	PM	PM10	VOC		PM	PM10	PM	PM10
Preblending Operations (PB1 through PB3)	3-01-018-02	0.0825	3	2	0.7	0.248	0.165	0.058	1.08	0.72	0.25	99.9%	0.0002	0.0002	0.001	0.001
Preblending Operation (PB4)	3-01-018-02	0.0825	3	2	0.7	0.248	0.165	0.058	1.08	0.72	0.25	99.9%	0.0002	0.0002	0.001	0.001
Automatic Feeder System (AFS)	3-05-012-21	8.0375	3	1.5	0	24.1	12.1	0.000	106	52.8	0.00	99.9%	0.024	0.012	0.106	0.053
Automatic Feeder System (AFS2)	3-05-012-21	7.625	3	1.5	0	22.9	11.4	0.000	100	50.1	0.00	99.9%	0.023	0.011	0.100	0.050
Extruder (EX1)	-----	0.165	0	0	1	0.000	0.000	0.165	0.00	0.00	0.72	0.0%	0.000	0.000	0.000	0.000
Extruder (EX2)	-----	0.750	0	0	1	0.000	0.000	0.750	0.00	0.00	3.29	0.0%	0.000	0.000	0.000	0.000
Extruder (EX3)	-----	0.750	0	0	1	0.000	0.000	0.750	0.00	0.00	3.29	0.0%	0.000	0.000	0.000	0.000
Extruder (EX4)	-----	1.750	0	0	1	0.000	0.000	1.750	0.00	0.00	7.67	0.0%	0.000	0.000	0.000	0.000
Extruder (EX5)	-----	2.000	0	0	1	0.000	0.000	2.000	0.00	0.00	8.76	0.0%	0.000	0.000	0.000	0.000
Extruder (EX6)	-----	3.000	0	0	1	0.000	0.000	3.000	0.00	0.00	13.14	0.0%	0.000	0.000	0.000	0.000
Extruder (EX7)	-----	6.000	0	0	1	0.000	0.000	6.000	0.00	0.00	26.28	0.0%	0.000	0.000	0.000	0.000
Extruder (EX8)	-----	1.500	0	0	1	0.000	0.000	1.500	0.00	0.00	6.57	0.0%	0.000	0.000	0.000	0.000
Pelletizing Operations (P1)	3-01-018-21	0.165	0	0	0.3	0.000	0.000	0.050	0.00	0.00	0.22	0.0%	0.000	0.000	0.000	0.000
Pelletizing Operations (P2)	3-01-018-22	0.750	0	0	0.3	0.000	0.000	0.225	0.00	0.00	0.99	0.0%	0.000	0.000	0.000	0.000
Pelletizing Operations (P3)	3-01-018-23	0.750	0	0	0.3	0.000	0.000	0.225	0.00	0.00	0.99	0.0%	0.000	0.000	0.000	0.000
Pelletizing Operations (P4)	3-01-018-24	1.750	0	0	0.3	0.000	0.000	0.525	0.00	0.00	2.30	0.0%	0.000	0.000	0.000	0.000
Pelletizing Operations (P5)	3-01-018-25	2.000	0	0	0.3	0.000	0.000	0.600	0.00	0.00	2.63	0.0%	0.000	0.000	0.000	0.000
Pelletizing Operations (P6)	3-01-018-26	3.000	0	0	0.3	0.000	0.000	0.900	0.00	0.00	3.94	0.0%	0.000	0.000	0.000	0.000
Pelletizing Operations (P7)	3-01-018-27	6.000	0	0	0.3	0.000	0.000	1.800	0.00	0.00	7.88	0.0%	0.000	0.000	0.000	0.000
Pelletizing Operations (P8)	3-01-018-28	1.500	0	0	0.3	0.000	0.000	0.450	0.00	0.00	1.97	0.0%	0.000	0.000	0.000	0.000
Totals:						47.5	23.8	20.8	208	104	91.1		0.047	0.024	0.208	0.104

Methodology

Methodology same as that used in Appendix A to the TSD of FESOP 019-9668-00091

All Emission Factors are taken from similar processes.

Potential Emissions = (E.F. in lb./ton)* (throughput in ton/hour) * 8760 hrs/yr / 2000 lbs/hr

Controlled Emissions = Potential Emissions * (1-controlled efficiency)

E.F. for Raw Material Unloading are based on the SCC: 3-05-012-21, which is more conservative than 3-05-006-07. MSDS shows that the material will be either in pellets or powder form.

Extruder VOC average E.F. from State of Wisconsin DNR Stack Test Results Summary sent to SPI. dated 12/5/1997 and approved for FESOP 019-9668-00091

There is no styrene in the products used. Therefore, there are no styrene emissions and those emission factors from 3-01-018-21 are not used.

The combustion units are the only source of NOx at this source.