



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

November 3, 2003

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

TO: Interested Parties / Applicant

RE: American Renolit / 091-17752-00127

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



Joseph E. Bertoni  
Governor

Lori F. Kaplan  
Commissioner

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*make Indiana a cleaner, healthier place to live.*

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-

6015

(317) 232-8603  
(800) 451-6027  
[www.state.in.us/idem](http://www.state.in.us/idem)

## NEW SOURCE CONSTRUCTION PERMIT AND MINOR SOURCE OPERATING PERMIT (MSOP)

### OFFICE OF AIR QUALITY

**American Renolit Corporation  
1207 East Lincolnway  
LaPorte, Indiana 46350**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 091-17752-00127	
Issued by: <b>Original signed by</b>  Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: <b>November 3, 2003</b>  Expiration Date: <b>November 3, 2008</b>

## TABLE OF CONTENTS

### SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6,1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary

### SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Effective Date of the Permit [IC13-15-5-3]
- B.4 Renovation of Permits [326 IAC 2-1.1-9(5)]
- B.5 Permit Term and Renewal [326 IAC 2-6-1-7(a)][326 IAC 2-1.1-9.5]
- B.6 Modification to Permit [326 IAC 2]
- B.7 Minor Source Operating Permit [326 IAC 2-6.1]
- B.8 Phase Construction Time Frame
- B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]
- B.10 Preventive Maintenance Plan [326 IAC 1-6-3]
- B.11 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
- B.12 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-30-3-1]
- B.13 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
- B.14 Annual Fee Payment [326 IAC 2-1.1-7]

### SECTION C SOURCE OPERATION CONDITIONS

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]
- C.2 Permit Renovation [326 IAC 2-1.1-9]
- C.3 Opacity [326 IAC 5-1]
- C.4 Fugitive Dust Emissions [326 IAC 6-4]
- C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

#### Compliance Requirements [326 IAC 2-1.1-11]

- C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.8 Compliance Monitoring [326 IAC 2-1.1-11]
- C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
- C.11 Compliance Response Plan - Preparation and Implementation

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

- C.12 Malfunctions Report [326 IAC 1-6-2]
- C.13 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

### SECTION D.1 FACILITY OPERATION CONDITIONS

**TABLE OF CONTENTS (Continued)**

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

D.1.1 Particulate [326 IAC 6-3-2]

## TABLE OF CONTENTS (Continued)

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

### **Compliance Determination Requirements**

D.1.3 Particulate Control

### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

D.1.4 Visible Emissions Notations

D.1.5 Parametric Monitoring

D.1.6 Baghouse/Dust Collector Inspections

D.1.7 Broken or Failed Bag/Dust Collector Detection

### **Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.1.8 Record Keeping Requirements

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

### **Emission Limitations and Standards**

D.2.1 Particulate [326 IAC 6-3-2]

D.2.2 Particulate Control

## **SECTION D.3 FACILITY OPERATION CONDITIONS**

### **Emission Limitations and Standards**

D.3.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

D.3.2 VOC [326 IAC 12-1][40 CFR Part 60, Subpart FFF]

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]

D.3.4 Volatile Organic Compounds (VOC)

D.3.5 Preventive Maintenance Plan [326 IAC 1-6-3]

### **Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

D.3.6 Record Keeping Requirements

## **SECTION D.4 FACILITY OPERATION CONDITIONS**

### **Emission Limitations and Standards**

Annual Notification

## 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 and A.2 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 flexible plastic film manufacturing plant.

Authorized Individual:	Director of Manufacturing Operations
Source Address:	1207 East Lincolnway, LaPorte, Indiana 46350
Mailing Address:	1207 East Lincolnway, LaPorte, Indiana 46350
General Source Phone:	(219) 324-6886
SIC Code:	3081
County:	LaPorte
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit (MSOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

---

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
- (1) One (1) PVC plastic film calender (identified as calender 1), constructed in 1999, with a maximum throughput rate of 1,600 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 1-1.
  - (2) One (1) PVC plastic film calender (identified as calender 2), constructed in 2001, with a maximum throughput rate of 925 pounds of raw material per hour, and consisting of a PVC mixing area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 2-1.
  - (3) One (1) PVC plastic film calender (identified as calender 3), constructed in 2003, with a maximum throughput rate of 1,800 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calendar are exhausted through stack CAL 3-1.
  - (4) Four (4) liquid scale areas (identified as W2, W3, W4, and W6).
  - (5) Two (2) weigh scale and mixing areas (identified as W1 and W5) consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks (identified as Tanks 91 and 92). Each weigh scale area handles a maximum of 13,200

- pounds per hour. Emissions are controlled by two (2) dust collectors, which exhausts at stacks PVC MIX-2 and PVC MIX-4.
- (6) PVC storage and handling systems including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and nine (9) storage silos (identified as Silos 1 through 9).
  - (7) Sixteen (16) storage tanks, comprising:
    - (A) Ten (10) storage tanks (identified as T-31 through T-34, T-38, and T-40 through T-44), each having a maximum storage capacity of 65 gallons.
    - (B) Four (4) storage tanks (identified as T-45 through T48), each having a maximum storage capacity of 8,086 gallons.
    - (C) Two (2) holding tanks (identified as HT-1 and HT-2), each having a maximum storage capacity of 52.8 gallons.
  - (8) Four (4) cooling towers.
  - (9) Two (2) natural gas fired oil heaters (identified as OH-1 and OH-2), each with a maximum heat input of 3.4 MMBtu per hour.
- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
- (1) One (1) PP plastic film manufacturing line (identified as PP Line 1), constructed in 1985, with a maximum throughput rate of 1,000 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 1A and 1B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted through stack PP1-1. The scrap recycling system has a maximum throughput capacity of 131 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP1-2.
  - (2) One (1) PP plastic film manufacturing line (identified as PP Line 2), constructed in 1988, with a maximum throughput rate of 1200 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 2A and 2B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted through stacks PP2-1 and PP2-2. The scrap recycling system has a maximum throughput capacity of 171 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP2-3.
  - (3) One (1) PP plastic film manufacturing line (identified as PP Line 3), constructed in 1997, with a maximum throughput rate of 1400 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 3A and 3B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage

container), and one (1) winder. Emissions from the chill roll are exhausted through stack PP3-1. The scrap recycling system has a maximum throughput capacity of 179 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP3-2.

- (4) Polypropylene storage and handling systems, with a maximum throughput capacity of 3600 pounds per hour, including eight (8) silos (identified as Silos 9 through 16), storage hoppers, three (3) gravity feed weigh scales, and a mixing hopper. The storage silos are used to store polypropylene plastic resin pellets.
  - (5) One (1) cooling tower.
- (c) One (1) lacquer line (identified as LL1), with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches. This unit will be constructed in 2003.

## **SECTION B                    GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

---

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

### **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      Effective Date of the Permit [IC13-15-5-3]**

---

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)]**

---

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5      Permit Term and Renewal [326 IAC 2-6.1-7(a)][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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.6      Modification to Permit [326 IAC 2]**

---

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.7      Minor Source Operating Permit [326 IAC 2-6.1]**

---

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a)      The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1)      If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2)      If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

#### B.8 Phase Construction Time Frame

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this permit to construct if the:

- (a) Construction of one (1) lacquer line has not begun within eighteen (18) months from the effective date of this permit or if during the construction of one (1) lacquer line, work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

#### B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) The notification 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.

#### B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

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

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 PMP's 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 PMP 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 an "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.11 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (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.12 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [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 permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.13 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

---

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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.

**B.14 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 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.5 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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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

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

---

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (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 the IDEM, OAQ, if the source 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.7 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

#### C.8 Compliance Monitoring [326 IAC 2-1.1-11]

---

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### C.9 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.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

---

- (a) Whenever a condition in this permit requires the measurement of total static 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 ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a (*temperature or flow rate*), 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 ( $\pm 2\%$ ) 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.

C.11 Compliance Response Plan - Preparation and Implementation

---

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. 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 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 timeframe 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 or Operation, Maintenance and Monitoring (OMM) Plan, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (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 Operation, Maintenance and Monitoring (OMM) Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) 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 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 status of the applicable compliance monitoring parameter with respect to normal, and the results of the 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 a minor permit modification 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) 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.

## **Record Keeping and Reporting Requirements**

### **C.12 Malfunctions Report [326 IAC 1-6-2]**

---

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]**

---

- (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 when operation begins.

**C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

---

- (a) 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
- (b) 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.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description:**

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
  - (1) One (1) PVC plastic film calender (identified as calender 1), constructed in 1999, with a maximum throughput rate of 1600 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 1-1.
  - (2) One (1) PVC plastic film calender (identified as calender 2), constructed in 2001, with a maximum throughput rate of 925 pounds of raw material per hour, and consisting of a PVC mixing area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 2-1.
  - (3) One (1) PVC plastic film calender (identified as calender 3), constructed in 2003, with a maximum throughput rate of 1,800 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calendar are exhausted through stack CAL 3-1.
  - (5) Two (2) weigh scale and mixing areas (identified as W1 and W5) consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks (identified as Tanks 91 and 92). Each weigh scale area handles a maximum of 13,200 pounds per hour. Emissions are controlled by two (2) dust collectors, which exhausts at stacks PVC MIX-2 and PVC MIX-4.
  - (6) PVC storage and handling systems including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and nine (9) storage silos (identified as Silos 1 through 9).

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

**Emission Limitations and Standards**

**D.1.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PVC film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
Calender Line 1	1,600	0.80	3.53
Calender Line 2	925	0.46	2.45
Calender Line 3	1,800	0.90	3.82
Each of the Two (2) Weigh Scale and Mixing Areas (W1 and W5)	13,200	6.60	14.5

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
PVC Handling	13,200	6.60	14.5

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

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

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

**D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

**Compliance Determination Requirements**

**D.1.3 Particulate Control**

In order to comply with D.1.1, the dust collectors for particulate control shall be in operation and control emissions from the PVC manufacturing facilities at all times that the PVC manufacturing facilities are in operation.

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.1.4 Visible Emissions Notations**

- (a) Visible emission notations of the weigh scale and mixing areas (identified as W1 and W5) and PVC handling stack exhaust shall be performed once per shift during normal daylight operations. 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 and Implementation shall be considered a deviation from this permit.

**D.1.5 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse/dust collector used in conjunction with the weigh scale and mixing areas (identified as W1 and W5) and PVC handling, at least once per shift when the weigh scale and mixing areas (identified as W1 and W5) and PVC handling are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse/dust collector is outside the normal range of 3.0 and 6.0 inches of water

for W1 and 0.7 and 2.5 inches of water for W5 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 and Implementation 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.1.6 Baghouse/Dust Collector Inspections

An inspection shall be performed each calendar quarter of all bags controlling the weigh scale and mixing areas (identified as W1 and W5) and PVC handling. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.1.7 Broken or Failed Bag/Dust Collector Detection

In the event that bag 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 and Implementation 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 baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

### **Record Keeping and Reporting Requirement**

#### D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the weigh scale and mixing areas (identified as W1 and W5) and PVC handling stack exhaust once per shift.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.

- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6.
- (d) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description:

- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
- (1) One (1) PP plastic film manufacturing line (identified as PP Line 1), constructed in 1985, with a maximum throughput rate of 1,000 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 1A and 1B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted at stack PP1-1. The scrap recycling system has a maximum throughput capacity of 131 pounds of PP per hour, controlled by a dust collector and exhausting at stack PP1-2.
  - (2) One (1) PP plastic film manufacturing line (identified as PP Line 2), constructed in 1988, with a maximum throughput rate of 1,200 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 2A and 2B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted at stacks PP2-1 and PP2-2. The scrap recycling system has a maximum throughput capacity of 171 pounds of PP per hour, controlled by a dust collector and exhausting at stack PP2-3.
  - (3) One (1) PP plastic film manufacturing line (identified as PP Line 3), constructed in 1997, with a maximum throughput rate of 1,400 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 3A and 3B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted through stack PP3-1. The scrap recycling system has a maximum throughput capacity of 179 pounds of PP per hour, controlled by a dust collector and exhausting at stack PP3-2.
  - (4) Polypropylene storage and handling systems, with a maximum throughput capacity of 3,600 pounds per hour, including eight (8) silos (identified as Silos 9 through 16), storage hoppers, three (3) gravity feed weigh scales, and a mixing hopper. The storage silos are used to store polypropylene plastic resin pellets.

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

### Emission Limitations and Standards

#### D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PP film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
PP Line 1	1000	0.50	2.58
PP Line 1 Scrap Grinding	131	0.07	0.66
PP Line 2	1200	0.60	2.91
PP Line 2 Scrap Grinding	171	0.09	0.79
PP Line 3	1400	0.70	3.23
PP Line 3 Scrap Grinding	179	0.09	0.81
PP Handling	3600	1.80	6.08

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

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
 P = process weight rate in tons per hour

### Compliance Determination Requirements

#### D.2.2 Particulate Control

---

In order to comply with D.2.1, the dust collectors for particulate control shall be in operation and control emissions from the PP manufacturing facilities at all times that the PP manufacturing facilities are in operation.

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description:

- (c) One (1) lacquer line (identified as LL1), with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches. This unit will be constructed in 2003.

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

### Emission Limitations and Standards

#### D.3.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the one (1) lacquer line with one (1) rotogravure roll press as described in this section except when otherwise specified in 40 CFR Part 60, Subpart FFF.

#### D.3.2 VOC [326 IAC 12-1][40 CFR Part 60, Subpart FFF]

Pursuant to 40 CFR 60.582(a)(1), the Permittee shall use inks with a weighted average VOC content less than one (1) kilogram VOC per kilogram ink solids at the affected facility.

#### D.3.3 Volatile Organic Compounds (VOCs) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating), the volatile organic compound (VOC) content of the coating from one (1) lacquer line with one (1) rotogravure roll press shall be limited to 4.8 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator.

#### D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.2 and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.3.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.3.6 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2 and D.3.3, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description:

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
  - (4) Four (4) liquid scale areas (identified as W2, W3, W4, and W6).
  - (7) Sixteen (16) storage tanks, comprising:
    - (A) Ten (10) storage tanks (identified as T-31 through T-34, T-38, and T-40 through T-44), each having a maximum storage capacity of 65 gallons.
    - (B) Four (4) storage tanks (identified as T-45 through T48), each having a maximum storage capacity of 8,086 gallons.
    - (C) Two (2) holding tanks (identified as HT-1 and HT-2), each having a maximum storage capacity of 52.8 gallons.
  - (8) Four (4) cooling towers.
  - (9) Two (2) oil heaters (identified as OH-1 and OH-2), each with a maximum heat input of 3.4 MMBtu per hour.
- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
  - (5) One (1) cooling tower.

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

### Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>American Renolit Corporation</b>
<b>Address:</b>	<b>1207 East Lincolnway</b>
<b>City:</b>	<b>LaPorte, Indiana 46350</b>
<b>Phone #:</b>	<b>(219) 324-6886</b>
<b>MSOP #:</b>	<b>091-17752-00127</b>

American Renolit Corporation is

- still in operation.
- no longer in operation.

American Renolit Corporation is

- in compliance with the requirements of MSOP 091-17752-00127.
- not in compliance with the requirements of MSOP 091-17752-00127.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>



MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

PAGE 1 OF 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

---

---

**November 3, 2003**

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

Addendum to the  
Technical Support Document (TSD)  
for a New Source Construction and Minor Source Operating Permit

Source Name: American Renolit Corporation  
Source Location: 1207 East Lincolnway, LaPorte, Indiana 46350  
County: LaPorte  
SIC Code: 3081  
Operation Permit No.: 091-17752-00127  
Permit Reviewer: ERG/SD

On September 16, 2003, the Office of Air Quality (OAQ) had a notice published in the News Dispatch, Michigan City, Indiana, stating that American Renolit Corporation had applied for a New Source Construction and Minor Source Operating Permit (MSOP) to construct one (1) lacquer line and to operate a flexible plastic film manufacturing plant. The notice also stated that the OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. The notification requirement in C.16(b)(3) has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. This provides the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

C.11 Compliance Response Plan - Preparation and Implementation

---

.....

- (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:
  - ...
  - (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 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify** the IDEM, OAQ ~~shall be promptly notified~~ of the expected date of

the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

...

2. Failure to take reasonable response steps is considered a deviation from not "violation of" the permit, therefore, the language was revised in D.1.4, D.1.5 and D.1.7. accordingly. This change is consistent with language in C.11(b)(4).

#### D.1.4 Visible Emissions Notations

---

...

- (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 and Implementation shall be considered a ~~violation of~~ **deviation from** this permit.

#### D.1.5 Parametric Monitoring

---

The Permittee shall record the total static pressure drop across the baghouse/dust collector used in conjunction with the weigh scale and mixing areas (identified as W1 and W5) and PVC handling, at least once per shift when the weigh scale and mixing areas (identified as W1 and W5) and PVC handling are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse/dust collector is outside the normal range of 3.0 and 6.0 inches of water for W1 and 0.7 and 2.5 inches of water for W5 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 and Implementation shall be considered a ~~violation of~~ **deviation from** this permit.

#### D.1.7 Broken or Failed Bag/Dust Collector Detection

---

In the event that bag 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 and Implementation shall be considered a ~~violation of~~ **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 and OES 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.
3. D.1.7 has been modified to require the Permittee to notify OAQ when a broken bag will not be fixed within 10 days with an expected date that the failed units will be repaired or replaced.

#### D.1.7 Broken or Failed Bag/Dust Collector Detection

---

In the event that bag 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. ~~Operations may continue only if there are no visible emissions.~~ 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 and Implementation 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.**

**November 3, 2003**

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

**Technical Support Document (TSD) for a New Source Construction and  
Minor Source Operating Permit**

**Source Background and Description**

Source Name: American Renolit Corporation  
Source Location: 1207 East Lincolnway, LaPorte, Indiana 46350  
County: LaPorte  
SIC Code: 3081  
Operation Permit No.: 091-17752-00127  
Permit Reviewer: ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from American Renolit Corporation relating to the construction of one (1) lacquer line and operation of flexible plastic film manufacturing plant.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
- (1) One (1) PVC plastic film calender (identified as calender 1), constructed in 1999, with a maximum throughput rate of 1600 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 1-1.
  - (2) One (1) PVC plastic film calender (identified as calender 2), constructed in 2001, with a maximum throughput rate of 925 pounds of raw material per hour, and consisting of a PVC mixing area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 2-1.
  - (3) One (1) PVC plastic film calender (identified as calender 3), constructed in 2003, with a maximum throughput rate of 1,800 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calendar are exhausted through stack CAL 3-1.
  - (4) Four (4) liquid scale areas (identified as W2, W3, W4, and W6).
  - (5) Two (2) weigh scale and mixing areas (identified as W1 and W5) consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks (identified

as Tanks 91 and 92). Each weigh scale area handles a maximum of 13,200 pounds per hour. Emissions are controlled by two (2) dust collectors, which exhausts at stacks PVC MIX-2 and PVC MIX-4.

- (6) PVC storage and handling systems including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and nine (9) storage silos (identified as Silos 1 through 9).
  - (7) Sixteen (16) storage tanks, comprising:
    - (A) Ten (10) storage tanks (identified as T-31 through T-34, T-38, and T-40 through T-44), each having a maximum storage capacity of 65 gallons.
    - (B) Four (4) storage tanks (identified as T-45 through T48), each having a maximum storage capacity of 8,086 gallons.
    - (C) Two (2) holding tanks (identified as HT-1 and HT-2), each having a maximum storage capacity of 52.8 gallons.
  - (8) Four (4) cooling towers.
  - (9) Two (2) natural gas fired oil heaters (identified as OH-1 and OH-2), each with a maximum heat input of 3.4 MMBtu per hour.
- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
- (1) One (1) PP plastic film manufacturing line (identified as PP Line 1), constructed in 1985, with a maximum throughput rate of 1,000 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 1A and 1B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted through stack PP1-1. The scrap recycling system has a maximum throughput capacity of 131 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP1-2.
  - (2) One (1) PP plastic film manufacturing line (identified as PP Line 2), constructed in 1988, with a maximum throughput rate of 1,200 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 2A and 2B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted through stacks PP2-1 and PP2-2. The scrap recycling system has a maximum throughput capacity of 171 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP2-3.
  - (3) One (1) PP plastic film manufacturing line (identified as PP Line 3), constructed in 1997, with a maximum throughput rate of 1,400 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 3A and 3B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage

container), and one (1) winder. Emissions from the chill roll are exhausted through stack PP3-1. The scrap recycling system has a maximum throughput capacity of 179 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP3-2.

- (4) Polypropylene storage and handling systems, with a maximum throughput capacity of 3,600 pounds per hour, including eight (8) silos (identified as Silos 9 through 16), storage hoppers, three (3) gravity feed weigh scales, and a mixing hopper. The storage silos are used to store polypropylene plastic resin pellets.
- (5) One (1) cooling tower.

**Unpermitted Emission Units and Pollution Control Equipment**

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

**New Emission Units and Pollution Control Equipment Receiving Prior Approval**

The source plans to construct the following emission units and pollution control devices:

- (c) One (1) lacquer line (identified as LL1), with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches. This unit will be constructed in 2003.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) R -091-16512-00127, issued on April 11, 2003.

All conditions from previous approvals were incorporated into this permit.

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
PVCMIX-2	PVC Mixer	9	1.0	1.058	Ambient
PVCMIX-4	PVC Mixer	9	1.0	1.058	Ambient
CAL1-1	Extruder, Mill, and Calender	53.5	2.6 by 6.5	18,834	90
CAL2-1	Extruder, Mill, and Calender	51	2.6 by 6.5	18,834	90
CAL3-1	Extruder, Mill, and Calender	53.5	2.6 by 6.5	18.934	90
PP1-1	Chill Roll	15	15	1.0 by 1.0	90
PP1-2	Granulator	26.7	0.67	988	90
PP2-1	Chill Roll	33	1.08	3,500	90
PP2-2	Chill Roll	16	0.67	1,900	90

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
PP2-3	Granulator	26.3	0.67	988	90
PP-3-1	Chill Roll	15	0.5	1,235	90
PP3-2	Granulator	28	0.67	1,400	90

**Recommendation**

The staff recommends to the Commissioner that the construction and operation 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.

A complete application for the purposes of this review was received on July 29, 2003, with additional information received on August 12, 2003.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 8).

**Potential To Emit of Source Before Controls**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	14.0
PM10	14.0
SO <sub>2</sub>	0.02
VOC	83.9
CO	2.50
NO <sub>x</sub>	2.98

HAPs	Potential To Emit (tons/year)
Phenol	5.63
Acetophenone	0.017
Vinyl Chloride Monomer	4.55
Acetaldehyde	0.00126
Acrolein	0.00016
Acrylic Acid	0.00126
Formaldehyde	0.00142
Methylethylketone	0.00063
Propionaldehyde	0.00032
Triethylamine	6.75
Bis(2-ethylexyl) phthalate	0.44

TOTAL	17.4
-------	------

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP will be issued.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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.

**County Attainment Status**

The source is located in LaPorte County.

Pollutant	Status
PM10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) LaPorte County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 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.

**Source Status**

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	14.0
PM10	14.0
SO <sub>2</sub>	0.02
VOC	83.9
CO	2.50
NO <sub>x</sub>	2.98

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the revised potential to emit calculations (see Appendix A).

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on the revised potential to emit calculations (see Appendix A).

### Federal Rule Applicability

- (a) This source is subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing (326 IAC 12) because this source uses a rotogravure roll press used to coat flexible PVC films. Pursuant to 40 CFR 60.582(a)(1), the Permittee shall use inks with a weighted average VOC content less than one (1) kilogram VOC per kilogram ink solids at the affected facility.

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described above except when otherwise specified in 40 CFR 63, Subpart FFF.

- (b) Although constructed after July 23, 1984, the storage tanks are not subject to the New Source Performance Standard (NSPS), 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12), because the maximum capacities of the storage tanks are all less than 40 cubic meters (10,567 gallons).
- (c) This source is not subject to the requirements of 40 CFR 63, Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins (326 IAC 14), because this source is not a major source of hazardous air pollutants and does not manufacture Group I polymers and resins.

There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (d) This source is not subject to the requirements of 40 CFR 63, Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-Nylon Polyamides Production (326 IAC 14), because this source is not a major source of hazardous air pollutants and does not produce epoxy resins or non-nylon polyamides.
- (e) Although this source handles plastic materials, it is not subject to the requirements of 40 CFR 63, Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (326 IAC 14), because this source is not a major source of hazardous air pollutants and only performs finishing processes, which are specifically exempt from the requirements of this rule under 40 CFR 63.1310(d).
- (f) This source is not subject to the requirements of 40 CFR 61, Subpart F - National Emission Standard for Vinyl Chloride (326 IAC 14) because this source does not produce vinyl chloride or polymerized vinyl chloride.
- (g) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 14), because even though this source operates a rotogravure roll press, it is not a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.
- (h) This source is not subject to the requirements of 40 CFR 63, Subpart J - National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production because this source does not produce polyvinyl chloride and copolymers and is not a major source of hazardous air pollutants.
- (i) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (326 IAC 14), because this source is not a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.

#### **State Rule Applicability - Entire Source**

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

This source was constructed in the late 1980s and is not in one (1) of twenty-eight (28) source categories. The source has been modified several times. At construction, the source had a potential to emit for all criteria pollutants that were less than the PSD major source threshold of 250 tons per year, and modifications undertaken since the initial construction have not increased the potential to emit to greater than 250 tons per year. The source submitted an application in July, 2003 requesting the construction of one (1) lacquer line with a rotogravure roll press. After this modification, the potential to emit of all criteria pollutants from the entire source will remain less than 250 tons per year. Therefore, this source is a minor source under PSD and is not subject to the requirements of 326 IAC 2-2.

##### **326 IAC 2-6 (Emission Reporting)**

This source is located in LaPorte County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does 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 this permit:

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

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of the flexible plastic film manufacturing plant will emit less than 10 tons per year of a single HAP and less than 25 tons per year of any combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**State Rule Applicability - Polyvinyl Chloride (PVC) Film Manufacturing Facilities**

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

Although the polyvinyl chloride (PVC) film manufacturing facilities were all constructed after January 1, 1980 applicability date for this rule, the potential emissions of VOC from these units are less than 25 tons per year. Therefore, the provisions of 326 IAC 8-1-6 are not applicable to these emission units.

**326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PVC film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
Calender Line 1-1	1,600	0.80	3.53
Calender Line 2-1	925	0.46	2.45
Calender Line 3-1	1,800	0.90	3.82
Each of the two (2) Weigh Scale and Mixing Areas (W1 and W5)	13,200	6.60	14.5
PVC Handling	13,200	6.60	14.5

The pounds per hour limitations were calculated using the following equation:

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

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

The dust collectors for particulate control shall be in operation at all times the polyvinyl chloride (PVC) manufacturing facilities are in operation, in order to comply with these limits.

There are no controls associated with calendar lines 1, 2, and 3. Based on the calculations provided in Appendix A, these emission units will be in compliance with this rule.

### State Rule Applicability - Polypropylene (PP) Film Manufacturing Facilities

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

Although the polypropylene (PP) film manufacturing facilities units were all constructed after January 1, 1980 applicability date for this rule, the potential emissions of VOC from these units are less than 25 tons per year. Therefore, the provisions of 326 IAC 8-1-6 are not applicable to these emission units.

#### 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the polypropylene (PP) film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
PP Line 1	1000	0.50	2.58
PP Line 1 Scrap Grinding	131	0.07	0.66
PP Line 2	1200	0.60	2.91
PP Line 2 Scrap Grinding	171	0.09	0.79
PP Line 3	1400	0.70	3.23
PP Line 3 Scrap Grinding	179	0.09	0.81
PP Handling	3600	1.80	6.08

The pounds per hour limitations were calculated using the following equation:

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

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

The dust collectors for particulate control shall be in operation at all times the polypropylene (PP) manufacturing facilities are in operation, in order to comply with these limits.

### State Rule Applicability - Organic Liquid Storage Tanks

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The sixteen (16) storage tanks are not subject to 326 IAC 8-9 because this rule applies only to sources located in Clark, Floyd, Lake, and Porter counties.

### State Rule Applicability - One (1) Lacquer Line

#### 326 IAC 8-5-5 (Graphic Arts Operation)

This source is not subject to the provisions of 326 IAC 8-5-5 (Graphic Arts Operation) because it does not operate a packaging rotogravure, publication rotogravure, or flexographic printing presses. It operates one (1) rotogravure roll press for coating the PVC plastic films.

#### 326 IAC 8-2-11 (Fabric and Vinyl Coating)

This source is subject to 326 IAC 8-2-11 (Fabric and Vinyl Coating) because the one (1) rotogravure roll press applies either a water based primer coat or water based lacquer coat on PVC plastic

films. Pursuant to this rule, the Permittee must limit the VOC content of the coating to 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator from the rotogravure roll press.

#### **State Rule Applicability - Natural Gas Fired Oil Heaters**

There are no specifically applicable regulations that apply to these emission units.

#### **Conclusion**

The construction of the new laquer line and operation of this flexible plastic film manufacturing plant shall be subject to the conditions of the attached New Source Construction and Minor Source Operating Permit 091-17752-00127.

Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015

American Renolit Corporation  
1207 East Lincolnway  
LaPorte, Indiana 46350

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that American Renolit Corporation, 1267 East Lincolnway, LaPorte, Indiana, 46350, completed construction of the one (1) lacquer line on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on July 29, 2003 and as permitted pursuant to MSOP No. 091-17752, Plant ID No. 091-00127 issued on \_\_\_\_\_.
5. Additional (?operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

**Appendix A: Emission Calculations  
PM/PM10 Emissions**

**Company Name:** American Renolit Corporation  
**Address:** 1207 East Lincolnway, LaPorte, Indiana 46350  
**MSOP:** 091-17752  
**Plt ID:** 091-00127  
**Reviewer:** ERG/SD  
**Date:** August 8, 2003

Emission Units	Amount of Material Collected (lbs/hour)	Amount of Material Collected (tons/year)	Actual Collection Efficiency (%)	Uncontrolled PTE of PM/PM10 (tons/year)
PVC MIX-2	0.21	0.91	99.0%	0.92
PVC MIX-4	0.21	0.91	99.0%	0.92
CAL 1-1	0.31	1.37	75.0%	1.83
CAL 2-1	0.20	0.88	75.0%	1.17
CAL 3-1	0.35	1.55	75.0%	2.07
PP 1-2	0.42	1.83	99.8%	1.83
PP 2-3	0.52	2.28	99.8%	2.29
PP 3-2	0.63	2.74	99.8%	2.74
<b>TOTAL</b>				<b>13.8</b>

**METHODOLOGY**

Amount of Material Collected (tons/year) = Amount of Material Collected (lbs/hour) \* 1 ton/2000 lbs \* 8760 hours/year  
 Uncontrolled PTE of PM/PM10 (tons/year) = Amount of Material Collected (tons/year) \*1/Actual Collection Efficiency %

**Appendix A: Emission Calculations**  
**VOC Emissions**

**Company Name:** American Renolit Corporation  
**Address:** 1207 East Lincolnway, LaPorte, Indiana 46350  
**MSOP:** 091-17752  
**Plt ID:** 091-00127  
**Reviewer:** ERG/SD  
**Date:** August 8, 2003

Emission Units	Maximum Process Rate (lbs/hour)	Emission Factor (lb of VOC/lb of Product)	PTE of VOC (tons/year)
CAL 1-1	1600	0.00082	5.75
CAL 2-1	925	0.00082	3.32
CAL 3-1	1800	0.00082	6.46
PP 1-2	1000	0.0000594	0.26
PP 2-3	1200	0.0000594	0.31
PP 3-2	1400	0.0000594	0.36
<b>TOTAL</b>			<b>16.5</b>

**Note:**

The emission factor of 0.00082 lbs of VOC/lb of product is from a document called "Effect of Plasticizer Type and Level on Simulated Process Emissions From

However, this source uses a higher torque, therefore, this number should be increased by 25%. This increase results in an emission factor of 816.9 milligrams of VOC per kilogram of product, which is equivalent to 0.00082 pounds of VOC per pound of product.

The emission factor of 0.0000594 lbs of VOC/lb of product is from the "Journal of the Air & Waste Management Association," Volume 49, January 1999, page 55. The emission factor is 59.4 micrograms of VOC per gram of product, which is equivalent to 0.0000594 pounds of VOC per pound of product.

**METHODOLOGY**

PTE of VOC (tons/year) = Maximum Process Rate (lbs/hour) \* Emission Factor (lb of VOC/lb of Product) \* 1 ton/2000 lbs \* 8760 hour/year

**Appendix A: Emission Calculations  
Natural Gas Fired Oil Heaters**

**Company Name:** American Renolit Corporation  
**Address:** 1207 East Lincolnway, LaPorte, Indiana 46350  
**MSOP:** 091-17752  
**Pit ID:** 091-00127  
**Reviewer:** ERG/SD  
**Date:** August 8, 2003

Heat Input Capacity  
MMBtu/hour

Potential Throughput  
MMCF/year

6.8

59.6

(Note: Includes two 3.4 MMBtu per hour hot oil heaters)

**Pollutant**

	PM*	PM10*	SO <sub>2</sub>	NOx	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100 **see below	5.5	84.0
Potential To Emit (tons/year)	0.23	0.23	0.02	2.98	0.16	2.50

\*PM and PM10 emission factors are filterable and condensable PM and PM10.

\*\*Emission Factors for NOx: Uncontrolled = 100

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

**METHODOLOGY**

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) \* 8760 hours/year \* 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) \* Emission Factor (lb/MMCF) \* 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
Natural Gas Fired Oil Heaters**

**Company Name:** American Renolit Corporation  
**Address:** 1207 East Lincolnway, LaPorte, Indiana 46350  
**MSOP:** 091-17752  
**Pit ID:** 091-00127  
**Reviewer:** ERG/SD  
**Date:** August 8, 2003

**HAPs - Organics**

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	6.25E-05	3.57E-05	2.23E-03	5.36E-02	1.01E-04

**HAPs - Metals**

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	1.49E-05	3.28E-05	4.17E-05	1.13E-05	6.25E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
HAP Emissions**

**Company Name:** American Renolit Corporation  
**Address:** 1207 East Lincolnway, LaPorte, Indiana 46350  
**MSOP:** 091-17752  
**Plt ID:** 091-00127  
**Reviewer:** ERG/SD  
**Date:** August 8, 2003

HAP	* Emission Factor (lbs/lb processed)	Max. Material Processed (lbs/hour)			Total PVC Processed (tons/year)	PTE of HAPs (lbs/year)	PTE of HAPs (tons/year)
		CAL 1-1	CAL 2-1	CAL 3-1			
Acetophenone	9.10E-07	1600	925	1800	18944	34.5	0.017
Bis (2-ethylhexyl)phthalate (DEHP)	2.30E-05	1600	925	1800	18944	871	0.44
Phenol	2.97E-04	1600	925	1800	18944	11252	5.63
Vinyl Chloride Monomer (VCM)	2.40E-04	1600	925	1800	18944	9093	4.55
<b>TOTAL</b>						<b>10.6</b>	

\* Emission factors are from "Effect of Pasticizer Type and Level on Simulated Process Emissions From Experimental Flexible Polyvinyl Chloride Compounds" published by The Vinyl Institute and Chemical Fabrics and Film Association, Inc. (1997).

**METHODOLOGY**

PTE of HAPs (tons/year) = Total Amount of PVC Processed (lbs/year) \* Emission Factor (lbs HAP/lb processed) \* 1 ton/2000 lbs

HAP	* Emission Factor (lb HAP /lb processed)	Max. Material Processed (lbs/hour)			Total Polypropylene Processed (tons/yr)	PTE of HAPs (lbs/year)	PTE of HAPs (tons/year)
		PP 1-2	PP 2-3	PP 3-2			
Acetaldehyde	8.00E-08	1000	1200	1400	15768	2.52	0.00126
Acrolein	1.00E-08	1000	1200	1400	15768	0.32	0.00016
Acrylic Acid	8.00E-08	1000	1200	1400	15768	2.52	0.00126
Formaldehyde	9.00E-08	1000	1200	1400	15768	2.84	0.00142
Methylethylketone	4.00E-08	1000	1200	1400	15768	1.26	0.00063
Propionaldehyde	2.00E-08	1000	1200	1400	15768	0.63	0.00032
<b>TOTAL</b>						<b>0.005</b>	

\* Emission Factors are from Table 5 in "Development of Emission Factors for Polypropylene Processing" published in the *Journal of Air & Waste Management Association*, Volume 49, January 1999.

**Methodology:**

PTE of HAPs (tons/year) = Total Amount of Polypropylene Processed (lbs/year) \* Emission Factor (lbs HAP/lb processed) \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
VOC Emissions**

**Company Name:** American Renolit Corporation  
**Address:** 1207 East Lincolnway, LaPorte, Indiana 46350  
**MSOP:** 091-17752  
**Plt ID:** 091-00127  
**Reviewer:** ERG/SD  
**Date:** August 8, 2003

Press I.D.	Maximum Line Speed (ft/min)	Maximum Print Width (inches)	Max. Throughput (MMin <sup>2</sup> /year)
LL1	131	63.0	52,145

Press I.D	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles	Flash Off %	PTE of VOC (tons/year)
LL1				
Lacquer 70218	11.4	14.8%	100%	44.0
Lacquer 70212	11.4	16.6%	100%	49.3
Primer	8.5	8.10%	100%	18.0

\* Total PTE = **67.2** ton/year

\* Only one lacquer line can operate at a given time in addition to the primer. Therefore, only the worst case emissions from the use of lacquer are added to the total PTE.

**METHODOLOGY**

Max. Throughput (MMin<sup>2</sup>/year) = Maxium line speed (feet/minute) \* 12 inches/feet \* Maximum print width (inches) \* 60 minutes/ hour \* 8760 hours/year

PTE of VOC (tons/year) = Maximum Coverage lbs/MMin<sup>2</sup> \* Weight % volatiles \* Flash off % \* Max. throughput (MMin<sup>2</sup>/year) \* 1 ton/ 2000 lbs

Actual Hours of Operation = PTE of VOC (lbs/hour) \* Acutal hours of operation/year \* Actual days of operation/year

**Appendix A: Emission Calculations  
HAP Emissions**

**Company Name:** American Renolit Corporation  
**Address:** 1207 East Lincolnway, LaPorte, Indiana 46350  
**MSOP:** 091-17752  
**Plt ID:** 091-00127  
**Reviewer:** ERG/SD  
**Date:** August 8, 2003

Material	Max. Usage Rate (lb/hour)	Weight % Triethylamine	PTE of Triethylamine (tons/year)
Lacquer 70218	44.2	2.5%	4.84
Lacquer 70212	61.6	2.5%	6.75
<b>* TOTAL PTE</b>			<b>6.75</b>

\* Only one lacquer line can operate at a given time in addition to the primer. Therefore, only the worst case emissions from the use of lacquer are added to the total PTE. The primer does not have contain any HAPs.

**Note:** Triethylamine is found in WF-4664.90.92 % of WF-4664 is contained in Lacquer 70212 and 65.21% of WF-4664 is contained in Lacquer 70218

**METHODOLOGY**

Potential To Emit of HAPs (ton/year) = Max. Usage Rate (lb/hour) \* Weight % HAP \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Summary**

**Company Name:** American Renolit Corporation  
**Address:** 1207 East Lincolnway, LaPorte, Indiana 46350  
**MSOP:** 091-17752  
**Plt ID:** 091-00127  
**Reviewer:** ERG/SD  
**Date:** August 8, 2003

**POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>* Highest Single HAP</b>	<b>Total HAPs</b>
PVC MIX-2 and MIX-4	1.84	1.84						
CAL 1-1, CAL 2-1, CAL 3-1	5.06	5.06			15.5			10.6
PP 1-2, PP 2-3, PP 3-2	6.86	6.86			0.94		6.75	0.005
Oil Heaters	0.23	0.23	0.02	2.98	0.16	2.50	Negligible	Negligible
One (1) Lacquer Line					67.2			6.75
<b>TOTAL</b>	<b>14.0</b>	<b>14.0</b>	<b>0.02</b>	<b>2.98</b>	<b>83.9</b>	<b>2.50</b>	<b>6.75</b>	<b>17.4</b>

\* Triethylamine