



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: December 28, 2007
RE: Tegrant Diversified Brands, Inc. / 091-18404-00079
FROM: Matthew Stuckey, Deputy Branch 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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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www.IN.gov/idem

PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Tegrant Diversified Brands, Inc.
955 S. Woodland Avenue
Michigan City, Indiana 46360**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-18404-00079	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 28, 2007 Expiration Date: December 28, 2012

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary polystyrene shape molding operation.

Source Address:	955 S. Woodland Avenue, Michigan City, IN 46360
Mailing Address:	955 S. Woodland Avenue, Michigan City, IN 46360
General Source Phone Number:	724-843-8200
SIC Code:	3086
County Location:	LaPorte
Source Location Status:	Nonattainment for 8 Hour Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) expandable polystyrene foam molding process, identified as Source P001, consisting of the following emission units;
 - (1) Two (2) Hirsch 6000 pre-expanders, identified as PE1 and PE4, constructed in 1999 and 2003 respectively, each rated at 1500 pounds per hour, and exhausting to stacks S-4 and S-36, respectively;
 - (2) One (1) unnamed pre-expander, identified as PE3, constructed in 1999, rated at 500 pounds per hour and exhausting to stack S-5;
 - (3) One (1) Handle pre-expander, identified as PE2, constructed in 1999, rated at 1500 pounds per hour, exhausting to stack S-6;
 - (4) One Kurtz 1014 molding press, identified as MP1, constructed in 2004, rated at 250 pounds per hour;
 - (5) One (1) Kurtz 812 molding press, identified as MP2, constructed in 1999, rated at 200 pounds per hour;
 - (6) Six (6) Kurtz 813 molding presses, identified as MP3, MP4, MP5, MP17, MP21 and MP22, constructed in 1999, 1999, 2004, 2001, 2002 and 2002 respectively, each rated at 200 pounds per hour;
 - (7) Ten (10) Kurtz 68 molding presses, identified as MP6, MP7, MP8, MP9, MP10, MP11, MP12, MP18, MP19 and MP20, constructed in 1999, 1999, 1999, 1999, 1999, 1999, 1999, 2001, 2001 and 2001, respectively, each rated at 150 pounds per hour;

- (8) Two (2) Kohler BR620 molding presses, identified as MP13 and MP14, both constructed in 1999, each rated at 100 pounds per hour;
 - (9) Two (2) Kurtz ECO LTH molding presses, identified as MP15 and MP16, constructed in 2007, each rated at 150 pounds per hour.
 - (10) One (1) Kurtz 13517 molding press, identified as MP23, constructed in 2004, rated at 300 pounds per hour; and
 - (11) Sixty (60) Pre-puff storage silos, constructed in 1999, with a total maximum storage capacity of approximately 105,000 pounds.
- (b) One (1) boiler, model number CB 700-250, installed in 1996, fueled by natural gas only, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1; and
 - (c) One (1) natural gas fired boiler, installed in 2005, identified as B-3, rated at maximum heat input rate of 16.4 MMBtu per hour and exhausting through stack S-3.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) One (1) boiler, model number CB 700-200, installed in 1997, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2. [326 IAC 6-2]
- (b) Welding operations consisting of the following equipment: [326 IAC 6-3]
 - (1) Miller matic wire welder, identified as MS-1;
 - (2) Dialarc stick welder, identified as MS-3;
 - (3) Dialarc stick welder, identified as MS-4;
 - (4) Miller matic wire welder, identified as MS-5;
 - (5) Medium torch, identified as MS-6;
 - (6) Miller matic wire welder, identified as MS-7;
 - (7) Medium torch set, identified as MS-8;
 - (8) Dialarc stick welder, identified as MS-9; and

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T091-18404-00079, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "Responsible Official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

- (a) All terms and conditions of permits established prior to T091-18404-00079 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an

applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance

of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" 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 [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 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.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

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

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

- (c) If there is a “project” (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll)) at an existing emissions unit or at a source with Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and 326 IAC 2-3-1 (z)) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and IAC 2-3-1 (mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing Electric Utility Steam Generating Unit, then for that project the Permittee shall:
 - (1) Submit to IDEM, OAQ a copy of the information required by (c)(1) in Section C- General Record Keeping Requirements
 - (2) Submit a report to IDEM, OAQ within sixty (60) days after the end of each year during which records are generated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements. The report shall contain all information and data describing the annual emissions for the emissions units during the calendar year that preceded the submission of report.

Reports required in this part shall be submitted to:

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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) expandable polystyrene foam molding process, identified as Source P001, consisting of the following emission units;
- (1) Two (2) Hirsch 6000 pre-expanders, identified as PE1 and PE4, constructed in 1999 and 2003 respectively, each rated at 1500 pounds per hour, and exhausting to stacks S-4 and S-36, respectively;
 - (2) One (1) unnamed pre-expander, identified as PE3, constructed in 1999, rated at 500 pounds per hour and exhausting to stack S-5;
 - (3) One (1) Handle pre-expander, identified as PE2, constructed in 1999, rated at 1500 pounds per hour, exhausting to stack S-6;
 - (4) One Kurtz 1014 molding press, identified as MP1, constructed in 2004, rated at 250 pounds per hour;
 - (5) One (1) Kurtz 812 molding press, identified as MP2, constructed in 1999, rated at 200 pounds per hour;
 - (6) Six (6) Kurtz 813 molding presses, identified as MP3, MP4, MP5, MP17, MP21 and MP22, constructed in 1999, 1999, 2004, 2001, 2002 and 2002 respectively, each rated at 200 pounds per hour;
 - (7) Ten (10) Kurtz 68 molding presses, identified as MP6, MP7, MP8, MP9, MP10, MP11, MP12, MP18, MP19 and MP20, constructed in 1999, 1999, 1999, 1999, 1999, 1999, 1999, 2001, 2001 and 2001, respectively, each rated at 150 pounds per hour;
 - (8) Two (2) Kohler BR620 molding presses, identified as MP13 and MP14, both constructed in 1999, each rated at 100 pounds per hour;
 - (9) Two (2) Kurtz ECO LTH molding presses, identified as MP15 and MP16, constructed in 2007, each rated at 150 pounds per hour;
 - (10) One (1) Kurtz 13517 molding press, identified as MP23, constructed in 2004, rated at 300 pounds per hour; and
 - (11) Sixty (60) Pre-puff storage silos, constructed in 1999, with a total maximum storage capacity of approximately 105,000 pounds.

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

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

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) The total usage of volatile organic compounds (VOC) at the expandable polystyrene foam molding processes shall be limited to less than 254.98 tons per twelve (12) consecutive month period;
- (b) The total sourcewide VOC emissions shall be limited to less than 249 tons per twelve (12) consecutive month period. Compliance shall be determined using the following equation:

$$(\sum (U_X * V_X * L_E) + \sum (U_Y * V_Y * L_A)) / (2000 \text{ pounds/ ton}) \leq 249 \text{ tons per twelve (12) consecutive months}$$

Where:

- U_X = Pounds of EPS based beads from lot x used during the 12 month period
 V_X = VOC content of EPS based beads from lot x, in percent by weight expressed as a decimal
 L_E = Overall emission loss rate for EPS based bead usage (0.97 lb VOC/ ton material used)
 U_Y = Pounds of ARCEL based beads from lot x used during the 12 month period
 V_Y = VOC content of ARCEL based beads from lot x, in percent by weight expressed as a decimal
 L_A = Overall emission loss rate for ARCEL based bead usage (0.97 lb VOC/ ton material used)

- (c) The VOC emissions from the usage of EPS based beads shall not exceed 0.97 pound per pound of EPS based beads used;
- (d) The VOC emissions from the usage of ARCEL based beads shall not exceed 0.97 pound per pound of ARCEL based beads used.

These limits will limit the source-wide potential to emit of VOC to less than 250 tons per year. Compliance with these limits makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 not applicable.

D.1.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

- (a) Pursuant to CP 091-4823-00079, issued on March 29, 1996, the best available control technology (BACT) for the expandable polystyrene molding process shall be the use of the lowest available pentane content material without add-on control equipment. Also, the Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will satisfy the requirements of 326 IAC 8-1-6.
- (b) Pursuant to Part 70 Permit 091-7666-00079, issued on October 14, 1999, the best available control technology (BACT) for the pre-expanders will be:
- (1) The molding compound shall contain a maximum average of 5.5% VOC (pentane) content.
 - (2) The source will continue to work with resin suppliers to seek to obtain resins with

lower VOC content. The source will also continue to evaluate the alternate materials.

- (3) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will satisfy the requirements of 326 IAC 8-1-6.
- (c) Pursuant to OP 091-14438-00079, issued on November 2, 2001, the best available control technology (BACT) for the four (4) molding presses, identified as MP17, MP18, MP19 and MP20 will be:
- (1) The VOC usage for the four (4) molding presses shall be limited to 155.22 tons per twelve (12) consecutive month period.
 - (2) The molding compound shall contain a maximum average of 5.5% VOC (pentane) content.
 - (3) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will satisfy the requirements of 326 IAC 8-1-6.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2(c)(1), the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2(c)(1). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The total VOC usage for each month; and
 - (2) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2 (b)(1) and D.1.2(c)(2), the Permittee shall maintain records of the average monthly VOC (pentane) content.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2(c)(1) shall be submitted to the addresses listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, with thirty (30) days after the end of the quarter being reported.
- (b) To document compliance with Condition D.1.2, the Permittee shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous years search, and schedule of switching material with lower pentane and VOC content if the material is available.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) boiler, model number CB 700-250, fueled by natural gas only, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1.
- (c) One (1) natural gas fired boiler, identified as B-3, installed in 2005, rated at maximum heat input rate of 16.4 MMBtu per hour and exhausting through stack S-3.

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

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

D.2.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the two boilers rated at 10.5 MMBtu/hr and 16.4 MMBtu/hr, shall be limited to 0.591 pound per MMBtu and 0.431 pounds per MMBtu, respectively, which was determined by the following equation:

$$Pt = 1.09/Q^{0.26}$$

Where Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.2 Record Keeping Requirements [40 CFR Part 60.48c]

Pursuant to 40 CFR Part 60.48c, records shall be maintained of the amounts of natural gas combusted during each calendar month by the two boilers rated at 10.5 MMBtu/hr and 16.4 MMBtu/hr. These records shall be kept for at least the past 24 month period.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

- (1) One (1) boiler, model number CB 700-200, installed in 1997, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2. [326 IAC 6-2]
- (2) Welding operations consisting of the following equipment: [326 IAC 6-3]
 - (a) Miller matic wire welder, identified as MS-1;
 - (b) Dialarc stick welder, identified as MS-3;
 - (c) Dialarc stick welder, identified as MS-4;
 - (d) Miller matic wire welder, identified as MS-5;
 - (e) Medium torch, identified as MS-6;
 - (f) Miller matic wire welder, identified as MS-7;
 - (g) Medium torch set, identified as MS-8; and
 - (h) Dialarc stick welder, identified as MS-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 [326 IAC 2-7-5(1)]

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions of the 8.4 MMBtu per hour boiler shall be limited to 0.507 pounds per MMBtu, which was determined by the following equation:

$$Pt = 1.09/Q^{0.26}$$

Where Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.3.2 Particulate Matter [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. Therefore, particulate emission rate from the welding operations shall be limited to less than 0.551 pounds per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Tegant Diversified Brands, Inc.
Source Address: 955 S. Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 S. Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-18404-00079

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6868**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Tegrant Diversified Brands, Inc.
Source Address: 955 S. Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 S. Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-18404-00079

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
X The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Tegragt Diversified Brands, Inc.
 Source Address: 955 S. Woodland Avenue, Michigan City, IN 46360
 Mailing Address: 955 S. Woodland Avenue, Michigan City, IN 46360
 Part 70 Permit No.: T091-18404-00079
 Facility: Expandable polystyrene foam molding process, identified as Source P001
 Parameter: VOC Usage
 Usage Limit: 254.98 tons per 12 consecutive months

YEAR:

Month	EPS Usage (tpy)	Previous 11 Months	12 Consecutive Month Total	12 Consecutive Month Limit
	ARCEL Usage (tpy)			
Month 1				
Month 2				
Month 3				

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by:
 Title / Position:
 Signature:
 Date:
 Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Tegrant Diversified Brands, Inc.
Source Address: 955 S. Woodland Avenue, Michigan City, IN 46360
Mailing Address: 955 S. Woodland Avenue, Michigan City, IN 46360
Part 70 Permit No.: T091-18404-00079
Facility: Four (4) molding presses (MP17, MP18, MP19 and MP20)
Parameter: VOC Usage
Usage Limit: 155.72 tons per 12 consecutive months

YEAR:

Month	VOC Usage (tpy)	Previous 11 Months (tpy)	12 Consecutive Month Total (tpy)	12 Consecutive Month Limit (tpy)
Month 1				155.72
Month 2				155.72
Month 3				155.72

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Tegant Diversified Brands, Inc.
 Source Address: 955 S. Woodland Avenue, Michigan City, IN 46360
 Mailing Address: 955 S. Woodland Avenue, Michigan City, IN 46360
 Part 70 Permit No.: T091-18404-00079

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

Addendum to the Technical Support Document (TSD) for a
Title V Operating Permit Renewal

Source Background and Description

Source Name:	Tegrant Diversified Brands, Inc.
Source Location:	955 S. Woodland Avenue, Michigan City, IN 46360
County:	LaPorte
SIC Code:	3086
Operation Permit No.:	T091-7666-00079
Operation Permit Issuance Date:	October 14, 1999
Permit Renewal No.:	T091-18404-00079
Permit Reviewer:	Ganesh Srinivasan/EVP

On August 27, 2007, the Office of Air Quality (OAQ) had a notice published in the News Dispatch in Michigan City, Indiana stating that Tegrant Diversified Brands, Inc. had applied for a Title V Permit Renewal T091-18404-00079. The notice also stated that 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.

On September 27, 2007, OAQ received comments from Ms. Victoria Brind'Amour of Tegrant Diversified Brands, Inc. The summary of the comments and corresponding responses are shown below. Changes made to the permit as a result of the comments are shown in **bold** and deleted permit language is shown with a ~~line through it~~. Any permit changes affecting the permit's Table of Contents are also revised without replication herein.

Comment 1:

On page 2 and 3 of the TSD, six molding presses (MP1, MP5, MP21, MP22, MP15 and MP16) have been listed under the "Unpermitted Emission Units" section. This equipment was legally installed pursuant to Operational Flexibility rules in 326 IAC 2-7-20. The "Enforcement Issue" section on page 3 implies that that the presses were installed improperly. We request that the permit documents be updated to reflect the correct information.

Response 1:

The source was permitted to construct and operate, under the original Part 70 permit T091-7666-00079 (issued on October 14, 1999), one (1) expandable polystyrene foam molding process line identified as Source P001. Source P001 was permitted to include seven (7) molding presses (identified as S-7, S-8, S-14, MP28 and MP29 and two others without specific ID) with a total rated throughput of 950 pounds per hour and total VOC potential to emit (PTE) of 29.75 tons per year.

After the original Part 70 permit was issued, the source constructed Source P001 consisting of six (6) molding presses that have slightly different capacities compared to the capacities of the seven (7) approved molding presses. The six (6) molding presses installed have a total rated throughput of 1,150 pounds per hour and VOC PTE of 36.01 tons per year. IDEM, OAQ determined that, since the six (6) installed molding presses are subject to the same regulations as the permitted molding presses without being subject to any additional federal or state rules and the difference in PTE VOC (6.26 tons per year) is less than the exemption level as specified under 326 IAC 2-1.1-3(e)(1), the differences can be considered as descriptive changes. Therefore, IDEM, OAQ agrees that the six (6) installed molding presses should have been considered already permitted. There should have been no enforcement action required with the six (6) installed molding presses.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented as part of the record regarding this permit decision. There are no changes to the permit as a result of this comment.

Comment 2:

Tegant Diversified Brands, Inc. requests that condition D.1.1 be changed to remove all usage limits based on resin type (i.e. EPS materials vs ARCEL) and instead use the equation that calculates the combined VOC emissions based on EPS and ARCEL usage to limit VOC emissions to 249 tons per 12 consecutive month period. This approach will allow the plant maximum flexibility to meet business demands and customer specifications, while still ensuring the plant stays below the PSD major source threshold. Further, we wish to point out that the VOC emission rate typically used for both resin types (EPS and ARCEL) is 97% of initial VOC present.

Response 2:

IDEM, OAQ has agreed to revise Condition D.1.1 to allow for the source's operational flexibility as follows:

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) The total usage of volatile organic compounds (VOC) at the expandable polystyrene foam molding processes shall be limited to less than 254.98 tons per twelve (12) consecutive month period;
- (b) **The total sourcewide VOC emissions shall be limited to less than 249 tons per twelve (12) consecutive month period. Compliance shall be determined using the following equation:**

$$(\sum (U_x * V_x * L_E) + \sum (U_y * V_y * L_A)) / (2000 \text{ pounds/ ton}) \leq \quad \mathbf{249 \text{ tons per twelve (12) consecutive months}}$$

Where:

- U_x = Pounds of EPS based beads from lot x used during the 12 month period**
V_x = VOC content of EPS based beads from lot x, in percent by weight expressed as a decimal
L_E = Overall emission loss rate for EPS based bead usage (0.97 lb VOC/ ton material used)
U_y = Pounds of ARCEL based beads from lot x used during the 12 month period
V_y = VOC content of ARCEL based beads from lot x, in percent by weight expressed as a decimal
L_A = Overall emission loss rate for ARCEL based bead usage (0.97 lb VOC/ ton material used)

~~(b) The expandable polystyrene foam molding processes shall use no more than 201.85 tons per 12 consecutive months of EPS;~~

(c) The VOC emissions from the usage of EPS based beads shall not exceed 0.97 pound per pound of EPS based beads used;

~~(d) The expandable polystyrene foam molding processes shall use no more than 53.13 tons per 12 consecutive months of ARCEL; and~~

(de) The VOC emissions from the usage of ARCEL based beads shall not exceed 0.97 pound per pound of ARCEL based beads used.

These limits will limit the source-wide potential to emit of VOC to less than 250 tons per year. Compliance with these limits makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 not applicable.

Comment 3:

Condition D.1.4(a) refers to records kept in accordance with four specific parameters but only two parameters are listed.

Response 3:

Condition D.1.4(a) has been updated as shown below:

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2(c)(1), the Permittee shall maintain records in accordance with (1) through ~~(2)(4)~~ below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2(c)(1). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

Comment 4:

Condition D.1.2(c) refers to six molding presses. Only four of the molding presses were installed. Hence, please remove the remaining two molding presses from the condition. Also, the presses should not be identified by their stack ID. Conditions D.1.2(b), (c) and D.1.4(b) refer to pentane content. Please replace that with VOC (pentane) content.

Response 4:

Conditions D.1.2(b), (c) and D.1.4(b) has been updated as shown below:

D.1.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

- (b) Pursuant to Part 70 Permit 091-7666-00079, issued on October 14, 1999, the best available control technology (BACT) for the pre-expanders will be:

- (1) The molding compound shall contain a maximum average of 5.5% **VOC (pentane) content** ~~pentane~~.

- (c) Pursuant to OP 091-14438-00079, issued on November 2, 2001, the best available control technology (BACT) for the **four (4)** ~~six (6)~~ molding presses, identified **as MP17, MP18, MP19 and MP20** ~~by their stack ID as S-29, S-30, S-31, S-32, S-33 and S-34~~ will be:

- (1) The VOC usage for the **four (4)** ~~six (6)~~ molding presses shall be limited to 155.22 tons per twelve (12) consecutive month period.
- (2) The molding compound shall contain a maximum average of 5.5% **VOC (pentane) content** ~~pentane~~.

D.1.4 Record Keeping Requirements

- (b) To document compliance with Condition D.1.2 (b)(1) and D.1.2(c)(2), the Permittee shall maintain records of the average monthly **VOC (pentane)** ~~pentane~~ content.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Tegrant Diversified Brands, Inc.
Source Location:	955 S. Woodland Avenue, Michigan City, IN 46360
County:	LaPorte
SIC Code:	3086
Operation Permit No.:	T091-7666-00079
Operation Permit Issuance Date:	October 14, 1999
Permit Renewal No.:	T091-18404-00079
Permit Reviewer:	Ganesh Srinivasan/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Tegrant Diversified Brands, Inc. relating to the operation of expandable polystyrene compound molding into shape molded products.

History

On July 5, 2007, SCA Packaging North America, Inc. submitted an application (Permit No: 091-24997-00079) to the OAQ requesting to change the source name from SCA Packaging North America, Inc. to Tegrant Diversified Brands, Inc. This name change request has been combined with the Title V Renewal (Permit No: 091-18404-00079).

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) expandable polystyrene foam molding process, identified as Source P001, consisting of the following emission units.
 - (1) Two (2) Hirsch 6000 pre-expanders, identified as PE1 and PE4, constructed in 1999 and 2003 respectively, each rated at 1500 pounds per hour, and exhausting to stacks S-4 and S-36, respectively;
 - (2) One (1) unnamed pre-expander, identified as PE3, constructed in 1999, rated at 500 pounds per hour and exhausting to stack S-5;
 - (3) One (1) Handle pre-expander, identified as PE2, constructed in 1999, rated at 1500 pounds per hour, exhausting to stack S-6;
 - (4) One (1) Kurtz 812 molding press, identified as MP2, constructed in 1999, rated at 200 pounds per hour;
 - (5) Three (3) Kurtz 813 molding presses, identified as MP3, MP4 and MP17, constructed in 1999, 1999 and 2001 respectively, each rated at 200 pounds per hour;
 - (6) Ten (10) Kurtz 68 molding presses, identified as MP6, MP7, MP8, MP9, MP10, MP11, MP12, MP18, MP19 and MP20, constructed in 1999, 1999, 1999, 1999, 1999, 1999, 1999, 2001, 2001 and 2001, respectively, each rated at 150 pounds per hour;

- (7) Two (2) Kohler BR620 molding presses, identified as MP13 and MP14, both constructed in 1999, each rated at 100 pounds per hour;
 - (8) One (1) Kurtz 13517 molding press, identified as MP23, constructed in 2004, rated at 300 pounds per hour; and
 - (9) Sixty (60) Pre-puff storage silos, constructed in 1999, with a total maximum storage capacity of approximately 105,000 pounds.
- (b) One (1) boiler, model number CB 700-250, installed in 1996, fueled by natural gas only, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1.
 - (c) One (1) natural gas fired boiler, installed in 2005, identified as B-3, rated at maximum heat input rate of 16.4 MMBtu per hour and exhausting through stack S-3.

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) expandable polystyrene foam molding process, identified as Source P001, consisting of the following emission units.
 - (1) One Kurtz 1014 molding press, identified as MP1, constructed in 2004, rated at 250 pounds per hour;
 - (2) One (1) Kurtz 813 molding presses, identified as MP5, constructed in 2004, rated at 200 pounds per hour;
 - (3) Two (2) Kurtz 813 molding presses, identified as MP21 and MP22, constructed in 2002, each rated at 200 pounds per hour; and
 - (4) Two (2) Kurtz ECO LTH molding presses, identified as MP15 and MP16, constructed in 2007, each rated at 150 pounds per hour.

Emission Units and Pollution Control Equipment Removed From the Source

The following emission units and pollution control devices have been removed:

- (a) One (1) expandable polystyrene foam molding process, identified as Source P001, consisting of the following emission units.
 - (1) Two (2) molding presses each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8;
 - (2) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14;
 - (3) Two (2) molding presses, model type Kurtz K813, identified as MP28 and MP29, each rated at 150 pounds per hour; and
 - (4) Two (2) molding presses, model number BR 620, rated at 100 pounds per hour, and exhausting to S-25.

Insignificant Activities

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

- (a) One (1) boiler, model number CB 700-200, installed in 1997, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2. [326 IAC 6-2]
- (b) Welding operations consisting of the following equipment: [326 IAC 6-3]
 - (1) Miller matic wire welder, identified as MS-1;
 - (2) Dialarc stick welder, identified as MS-3;
 - (3) Dialarc stick welder, identified as MS-4;
 - (4) Miller matic wire welder, identified as MS-5;
 - (5) Medium torch, identified as MS-6;
 - (6) Miller matic wire welder, identified as MS-7;
 - (7) Medium torch set, identified as MS-8; and
 - (8) Dialarc stick welder, identified as MS-9.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Title V OP T091-7666-00079, issued on October 14, 1999;
- (b) First Administrative Amendment: 091-11627-00079, issued on January 18, 2000
- (c) First Minor Source Modification No.: 091-12933, issued on January 4, 2001;
- (d) Second Administrative Amendment No.: 091-13602, issued on January 17, 2001;
- (e) First Significant Source Modification No.: 091-14438, issued on November 2, 2001;
- (f) First Significant Permit Modification No.: 091-14496, issued on November 20, 2001;
- (g) First Permit Reopen No.: 091-13378, issued on February 13, 2002;
- (h) Third Administrative Amendment No.: 091-15449, issued on March 20, 2002;
- (i) Second Significant Source Modification No.: 091-15084, issued on April 3, 2002;
- (j) Second Significant Permit Modification No.: 091-15559, issued on July 22, 2002;
- (k) Second Minor Source Modification No.: 091-15886, issued on August 20, 2002;
- (l) First Minor Permit Modification No.: 091-15930, issued on October 4, 2002;
- (m) Third Minor Source Modification No.: 091-16666, issued on May 23, 2003;
- (n) Third Significant Permit Modification No.: 091-16694, issued on July 30, 2003;
- (o) Fourth Minor Source Modification No.: 091-18626, issued on April 6, 2004;
- (p) Second Minor Permit Modification No.: 091-18823, issued on July 2, 2004; and
- (q) Third Minor Permit Modification No.: 091-20508, issued on June 17, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".

- (a) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (b) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirement.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 9).

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Non Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (b) LaPorte County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) LaPorte County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.29
PM-10	1.18
SO ₂	0.09
VOC	918.81
CO	12.99
NO _x	15.46

HAPs	tons/year
Ethyl Benzene	< 10
Total	< 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (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/or 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.
- (d) Fugitive Emissions:
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	81.00
CO	2.00
NO _x	2.00
HAPs	Not Reported

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Combined HAPs
Pre-Expanders	0.00	0.00	0.00	249 ⁽¹⁾	0.00	0.00	1.49	3.61
Pre-puff	0.00	0.00	0.00		0.00	0.00	Neg.	Neg.
Molding Presses	0.00	0.00	0.00		0.00	0.00	Neg.	Neg.
Finished Goods Storage	0.00	0.00	0.00		0.00	0.00	Neg.	Neg.
Combustion Units	0.29	1.18	0.09	0.85	12.99	15.46	0.28	0.29
Total PTE	0.29	1.18	0.09	< 250	12.99	15.46	< 10	< 25

(1) VOC limit of less than 249 tons per year for foam molding processes (P001) at the source to avoid 326 IAC 2-2.

- (a) This existing stationary source is major for Emission Offset because the emissions of the nonattainment pollutant, VOC is greater than one hundred (>100) tons per year.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Pre-Expanders - VOC	None	Y	674.52	249	100	N	N
Pre-Puff - VOC	None	Y	38.56		100	N	N
Molding Presses - VOC	None	Y	123.70		100	N	N
Finished Goods Storage - VOC	None	Y	81.18		100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (b) The 10.5 MMBtu/hr and 16.4 MMBtu/hr natural gas fired boilers are subject to the New Source Performance Standard (NSPS), 326 IAC 12 (40 CFR Part 60.40c, Subpart Dc) because they were constructed after the applicable date of June 9, 1989 and the maximum heat input capacity is greater than the applicable maximum heat input capacity of 10 MMBtu/hr. Pursuant to this NSPS, the owner/operator of this facility must comply with the reporting and recordkeeping as indicated under 40 CFR Part 60.48c. There are no other applicable requirements included under this section since the boilers can only combust natural gas.
- (c) The boiler rated at 8.4 MMBtu/hr is not subject to the requirements of New Source Performance Standard (NSPS), 326 IAC 12 (40 CFR 60.40c, Subpart Dc), because the maximum heat input capacity of the boiler is less than the applicable maximum heat input capacity of 10 MMBtu/hr. Therefore, the requirements of 326 IAC 12 (40 CFR 60.40c, Subpart Dc) are not included in the permit.
- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, because the source is not a major source of HAP. The potential source wide emissions of any combination of HAPs and any single HAP are less than 25 and 10 tons per twelve (12) consecutive month period, respectively.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD). This rule applies to sources, which are not one of the 28 source categories, with potential emissions of any criteria pollutant greater than or equal to 250 tons per year. The source was constructed after the 326 IAC 2-2 applicability date of August 7, 1977, and is not one of the 28 source categories. Pursuant to T091-7666-00079, issued on October 14, 1999, the source agreed to limit its VOC emissions from the foam molding processes to limit source-wide VOC emissions to less than 250 tons per year by limiting their VOC usage.

The total usage of VOC at the manufacturing line which includes pre-expanders, pre-puff, molding presses and finished goods storage, shall be limited to less than 254.98 tons per twelve (12) consecutive month period.

- (a) The expandable polystyrene foam molding processes shall use no more than 201.85 tons per 12 consecutive months of EPS;
- (b) The VOC emissions from the usage of EPS shall not exceed 0.97 pound per pound of EPS used;
- (c) The expandable polystyrene foam molding processes shall use no more than 53.13 tons per 12 consecutive months of ARCEL; and
- (d) The VOC emissions from the usage of ARCEL shall not exceed 1 pound per pound of ARCEL used.

The Loss Rate % was obtained from sample analysis performed by the source.

These limits will limit the source-wide potential to emit of VOC to less than 250 tons per year. Compliance with these limits makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 not applicable.

326 IAC 2-3 (Emission Offset)

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. LaPorte County has been designated as nonattainment for the 8-hour ozone standard. Currently, the source wide potential to emit of NO_x and VOC is 15.46 and less than 250 tons per year, respectively. The source did not have any new construction or modifications after April 15, 2005. Therefore, the requirements of Emissions Offset 326 IAC 2-3 do not apply; however, the source is classified as major for the purpose of Emissions Offset since the potential to emit of VOC is greater than 100 tons per year.

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

The operation of polystyrene shape molding unit will emit less than ten (10) tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, rule 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted annually if the potential to emit of VOC or PM₁₀ is greater than 250 tons per year, otherwise the emission statement shall be submitted triennially. For this source, the source wide emissions of VOC and PM₁₀ are each less than 250 tons per year. Therefore, in accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement shall be submitted triennially by July 1 beginning in 2004 and every 3 years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of 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 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (e) (Particulate Emissions Limitations for Manufacturing Process)

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. Therefore, particulate emission rate from the welding operations shall be limited to less than 0.551 pounds per hour.

326 IAC 6-2-4 (Particulate emissions limitation for facilities constructed after September 21, 1983)

- (a) The one (1) boiler, rated at 10.5 MMBtu/hr, constructed after September 1983, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

Where Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the boiler is 10.5 million British thermal units per hour.

$$Pt = 1.09/(10.5)^{0.26} = 0.5914 \text{ lb/MMBtu heat input}$$

The potential PM emission rate is:

$$0.09 \text{ ton/yr} * (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.0205 \text{ lb/hr}$$
$$(0.0205 \text{ lb/hr} / 10.5 \text{ MMBtu/hr}) = 0.0019 \text{ lb PM/MMBtu}$$

Therefore, the boiler will be able to comply with this rule.

- (b) The one (1) boiler, rated at 8.4 MMBtu/hr, constructed after September 1983, must comply with the requirements of 326 IAC 6-2-4.

The heat input capacity of the boiler is 8.4 million British thermal units per hour. There was one boiler with a heat input capacity of 10.5 MMBtu per hour when this boiler was installed; therefore the total Q is 18.9 MMBtu per hour.

$$Pt = 1.09/(18.9)^{0.26} = 0.507 \text{ lb/MMBtu heat input}$$

The potential PM emission rate is:

$$0.16 \text{ ton/yr} * (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.0365 \text{ lb/hr}$$
$$(0.0365 \text{ lb/hr} / 18.9 \text{ MMBtu/hr}) = 0.0019 \text{ lb PM/MMBtu}$$

Therefore, the boiler will be able to comply with this rule.

- (c) The one (1) boiler, rated at 16.4 MMBtu/hr, constructed after September 1983, must comply with the requirements of 326 IAC 6-2-4.

The heat input capacity of the boiler is 16.4 million British thermal units per hour. There were two boilers with a total heat input capacity of 18.9 MMBtu per hour when this boiler was installed; therefore the total Q is 35.3 MMBtu per hour.

$$Pt = 1.09/(35.3)^{0.26} = 0.431 \text{ lb/MMBtu heat input}$$

The potential PM emission rate is:

$$0.29 \text{ ton/yr} * (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.0662 \text{ lb/hr}$$
$$(0.0662 \text{ lb/hr} / 35.3 \text{ MMBtu/hr}) = 0.0018 \text{ lb PM/MMBtu}$$

Therefore, the boiler will be able to comply with this rule.

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

- (a) Pursuant to CP 091-4823-00079, issued on March 29, 1996, the best available control technology (BACT) for the expandable polystyrene molding process shall be the use of the lowest available pentane content material without add-on control equipment. Also, the Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will satisfy the requirements of 326 IAC 8-1-6.
- (b) Pursuant to Part 70 Permit 091-7666-00079, issued on October 14, 1999, the best available control technology (BACT) for the pre-expanders will be
- (1) The molding compound shall contain a maximum average of 5.5% pentane.
 - (2) The source will continue to work with resin suppliers to seek to obtain resins with lower VOC content. The source will also continue to evaluate the alternate materials.

- (3) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will satisfy the requirements of 326 IAC 8-1-6.
- (c) Pursuant to OP 091-14438-00079, issued on November 2, 2001, the best available control technology (BACT) for the six (6) molding presses, identified by their stack ID as S-29, S-30, S-31, S-32, S-33 and S-34 will be:
- (1) The VOC usage for the six (6) molding presses shall be limited to 155.22 tons per twelve (12) consecutive month period.
 - (2) The molding compound shall contain a maximum average of 5.5% pentane.
 - (3) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will satisfy the requirements of 326 IAC 8-1-6.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There is no compliance monitoring requirements for this facility.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on January 15, 2004.

Conclusion

The operation of this polystyrene shape molding source shall be subject to the conditions of this Part 70 permit **T091-18404-00079**.

Appendix A: Emissions Calculations

Company Name: Tegrant Diversified Brands, Inc.
Address City IN Zip: 955 S. Woodland Avenue, Michigan City, IN 46360
Permit Number: 091-18404-00079
Plt ID: 091-00079
Reviewer: GS/EVP

Uncontrolled Potential To Emit* (tons per year)								
Emission Unit	PM	PM10	SO2	NOx	VOC	CO	Single HAP Ethyl Benzene	Combined HAPs
Pre-Expanders	0.00	0.00	0.00	0.00	674.52	0.00	1.49	3.61
Pre-Puff	0.00	0.00	0.00	0.00	38.56	0.00	Neg.	Neg.
Molding Presses	0.00	0.00	0.00	0.00	123.70	0.00	Neg.	Neg.
Finished Goods Storage	0.00	0.00	0.00	0.00	81.18	0.00	Neg.	Neg.
Combustion Units	0.29	1.18	0.09	15.46	0.85	12.99	0.28	0.29
Total	0.29	1.18	0.09	15.46	918.81	12.99	< 10	< 25

* Based on 8760 Hours of Operation

Controlled Potential To Emit* (tons per year)						
Emission Unit	Material	Maximum Throughput (Entire Source) lbs/yr	Pentane(VOC) % by weight	Maximum VOC usage tons/yr	Loss Rate %	Potential VOC Emissions tons/yr
Entire Source	EPS	7,340,000	5.5%	201.85	97.0%	195.79
Entire Source	ARCEL	850,000	12.5%	53.13	100.0%	53.13
Entire Source	Combined		5.5%	254.98		248.92

* The maximum throughput is limited in order to keep the sourcewide VOC emissions under 250 tons per year (326 IAC 2-2)

Appendix A: Emissions Calculations
Emissions from Pre-Expanders

Company Name: Tegrant Diversified Brands, Inc.
Address City IN Zip: 955 S. Woodland Avenue, Michigan City, IN 46360
Permit Number: 091-18404-00079
Plt ID: 091-00079
Reviewer: GS/EVP

Expandable Poly Styrene (EPS)

Uncontrolled Potential to Emit* (tons/yr)				
Emission Unit (identified by Stack ID)	Maximum Throughput	Pentane(VOC) % by weight	Loss Rate %	Potential Emissions
	lbs/hr			tons/yr
PE1	1500	5.5%	24.0%	86.72
PE4	1500	5.5%	24.0%	86.72
PE3	500	5.5%	24.0%	28.91
PE2	1500	5.5%	24.0%	86.72
Total				289.08

* Based on 8760 hours of operation

The Loss Rate % was obtained from sample analysis performed by the source.

ARCEL

Uncontrolled Potential to Emit* (tons/yr)				
Emission Unit (identified by Stack ID)	Maximum Throughput	Pentane(VOC) % by weight	Loss Rate %	Potential Emissions
	lbs/hr			tons/yr
PE1	1500	5.5%	56.0%	202.36
PE4	1500	5.5%	56.0%	202.36
PE3	500	5.5%	56.0%	67.45
PE2	1500	5.5%	56.0%	202.36
Total				674.52

* Based on 8760 hours of operation

The Loss Rate % was obtained from sample analysis performed by the source.

Appendix A: Emissions Calculations
Emissions from Pre-Puff

Company Name: Tegrant Diversified Brands, Inc.
Address City IN Zip: 955 S. Woodland Avenue, Michigan City, IN 46360
Permit Number: 091-18404-00079
Pit ID: 091-00079
Reviewer: GS/EVP

Expandable Poly Styrene (EPS)

Uncontrolled Potential to Emit* (tons/yr)				
Emission Unit (identified by Stack ID)	Maximum Throughput	Pentane(VOC) % by weight	Loss Rate %	Potential Emissions
	lbs/yr			tons/yr
60 pre-puff storage silos	7,380,000	5.5%	19.0%	38.56

* Based on permit application

The Loss Rate % was obtained from sample analysis performed by the source.

ARCEL

Uncontrolled Potential to Emit* (tons/yr)				
Emission Unit (identified by Stack ID)	Maximum Throughput	Pentane(VOC) % by weight	Loss Rate %	Potential Emissions
	lbs/yr			tons/yr
60 pre-puff storage silos	850,000	5.5%	16.0%	3.74

* Based on permit application

The Loss Rate % was obtained from sample analysis performed by the source.

Appendix A: Emissions Calculations
Emissions from Molding Presses

Company Name: Tegrant Diversified Brands, Inc.
Address City IN Zip: 955 S. Woodland Avenue, Michigan City, IN 46360
Permit Number: 091-18404-00079
Plt ID: 091-00079
Reviewer: GS/EVP

Expandable Poly Styrene (EPS)

Uncontrolled Potential to Emit* (tons/yr)				
Emission Unit (identified by Stack ID)	Maximum Throughput	Pentane(VOC) % by weight	Loss Rate %	Potential Emissions
	lbs/hr			tons/yr
MP1	250	5.5%	13.0%	7.83
MP2	200	5.5%	13.0%	6.26
MP3	200	5.5%	13.0%	6.26
MP4	200	5.5%	13.0%	6.26
MP5	200	5.5%	13.0%	6.26
MP17	200	5.5%	13.0%	6.26
MP21	200	5.5%	13.0%	6.26
MP22	200	5.5%	13.0%	6.26
MP6	150	5.5%	13.0%	4.70
MP7	150	5.5%	13.0%	4.70
MP8	150	5.5%	13.0%	4.70
MP9	150	5.5%	13.0%	4.70
MP10	150	5.5%	13.0%	4.70
MP11	150	5.5%	13.0%	4.70
MP12	150	5.5%	13.0%	4.70
MP18	150	5.5%	13.0%	4.70
MP19	150	5.5%	13.0%	4.70
MP20	150	5.5%	13.0%	4.70
MP13	100	5.5%	13.0%	3.13
MP14	100	5.5%	13.0%	3.13
MP15	150	5.5%	13.0%	4.70
MP16	150	5.5%	13.0%	4.70
MP23	300	5.5%	13.0%	9.40
			Total	123.70

* Based on permit application

The Loss Rate % was obtained from sample analysis performed by the source.

Appendix A: Emissions Calculations
Emissions from Molding Presses

Company Name: Tegrant Diversified Brands, Inc.
Address City IN Zip: 955 S. Woodland Avenue, Michigan City, IN 46360
Permit Number: 091-18404-00079
Plt ID: 091-00079
Reviewer: GS/EVP

ARCEL

Uncontrolled Potential to Emit* (tons/yr)				
Emission Unit (identified by Stack ID)	Maximum Throughput	Pentane(VOC) % by weight	Loss Rate %	Potential Emissions
	lbs/hr			tons/yr
MP1	250	5.5%	10.0%	6.02
MP2	200	5.5%	10.0%	4.82
MP3	200	5.5%	10.0%	4.82
MP4	200	5.5%	10.0%	4.82
MP5	200	5.5%	10.0%	4.82
MP17	200	5.5%	10.0%	4.82
MP21	200	5.5%	10.0%	4.82
MP22	200	5.5%	10.0%	4.82
MP6	150	5.5%	10.0%	3.61
MP7	150	5.5%	10.0%	3.61
MP8	150	5.5%	10.0%	3.61
MP9	150	5.5%	10.0%	3.61
MP10	150	5.5%	10.0%	3.61
MP11	150	5.5%	10.0%	3.61
MP12	150	5.5%	10.0%	3.61
MP18	150	5.5%	10.0%	3.61
MP19	150	5.5%	10.0%	3.61
MP20	150	5.5%	10.0%	3.61
MP13	100	5.5%	10.0%	2.41
MP14	100	5.5%	10.0%	2.41
MP15	150	5.5%	10.0%	3.61
MP16	150	5.5%	10.0%	3.61
MP23	300	5.5%	10.0%	7.23
			Total	95.16

* Based on permit application

The Loss Rate % was obtained from sample analysis performed by the source.

**Appendix A: Emissions Calculations
Emissions from Storage Silos**

Company Name: Tegrant Diversified Brands, Inc.
Address City IN Zip: 955 S. Woodland Avenue, Michigan City, IN 46360
Permit Number: 091-18404-00079
Plt ID: 091-00079
Reviewer: GS/EVP

Expandable Poly Styrene (EPS)

Uncontrolled Potential to Emit* (tons/yr)				
Emission Unit (identified by Stack ID)	Maximum Throughput	Pentane(VOC) % by weight	Loss Rate %	Potential Emissions
	lbs/yr			tons/yr
Finished Goods Storage	7,380,000	5.5%	40.0%	81.18

* Based on permit application

The Loss Rate % was obtained from sample analysis performed by the source.

ARCEL

Uncontrolled Potential to Emit* (tons/yr)				
Emission Unit (identified by Stack ID)	Maximum Throughput	Pentane(VOC) % by weight	Loss Rate %	Potential Emissions
	lbs/yr			tons/yr
Finished Goods Storage	850,000	5.5%	18.0%	4.21

* Based on permit application

The Loss Rate % was obtained from sample analysis performed by the source.

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

Company Name: Tegrant Diversified Brands, Inc.
Address City IN Zip: 955 S. Woodland Avenue, Michigan City, IN 46360
Permit Number: 091-18404-00079
Pit ID: 091-00079
Reviewer: GS/EVP

Heat Input Capacity Emission Unit	MMBtu/hr	Potential Throughput MMCF/yr
CB 700-250	10.5	
CB 700-200	8.4	
B-3	16.4	
Total	35.3	309.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.29	1.18	0.09	15.46	0.85	12.99

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Boilers
 HAPs Emissions**

Company Name: Tegrant Diversified Brands, Inc.
Address City IN Zip: 955 S. Woodland Avenue, Michigan City, IN 46360
Permit Number: 091-18404-00079
Plt ID: 091-00079
Reviewer: GS/EVP

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.247E-04	1.855E-04	1.160E-02	2.783E-01	5.257E-04

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total
Potential Emission in tons/yr	7.731E-05	1.701E-04	2.165E-04	5.875E-05	3.247E-04	2.918E-01

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

