MINOR SOURCE CONSTRUCTION AND OPERATING PERMIT

IDEM, OFFICE OF AIR QUALITY, and

INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

RTP Company
8111 Zionsville Road
Indianapolis, Indiana 46268

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

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

Operation Permit No.: MSOP 097-11724-00316	
Issued by: Mona A. Salem Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date: July 13, 2000
Permit Revision No.: MSOP 097-14927-00316	Pages affected: 4,5,17 and 18
Issued by: Vaneeta M. Kumar Administrator OES	Issuance Date: September 19, 2001 Expiration Date: July 12, 2005
Second Permit Revision No.: MSOP 097-18659-00316	

Issued by: Original Signed By: John B. Chavez Administrator OES	Issuance date: March 1, 2004 Expiration date: July 12, 2005

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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) and City of Indianapolis, Office of Environmental Services (OES). 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary source, thermoplastic compounding operations.

Authorized Individual:	General Manager
Source Address:	8111 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address:	8111 Zionsville Road, Indianapolis, Indiana 46268
Phone Number:	(317) 802-9813
SIC Code:	3087
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit

A.2 Emissions units and Pollution Control Equipment Summary

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

(a) Four (4) Thermoplastic Compounding 2.5" Extruders, Emission Units IDs #1-#4, with a maximum capacity of 500 lb/hr each;

(b) One (1) Thermoplastic Compounding 53 mm Twin Extruder Emission Unit ID #5;

(c) One (1) Thermoplastic Compounding 70 mm Extruder, Emission Unit ID #6, with a maximum capacity of 1000 lb/hr;

(d) Two (2) Thermoplastic Compounding 3.5" Extruders, Emission Units IDs #7 and #8, with a maximum capacity of 900 lb/hr each;

(e) One (1) Thermoplastic Compounding 57 mm Extruder, Emission Unit ID #9, with a maximum capacity of 700 lb/hr;

(f) One (1) Thermoplastic Compounding 70 mm Extruder, Emission Unit ID #10, with a maximum capacity of 1,000 lb/hr;

(g) Two (2) Thermoplastic Compounding 4.5" Extruders, Emission Unit IDs #11 & #12, with a maximum capacity of 2,200 lb/hr each;

(h) Two (2) Thermoplastic Compounding 2" R&D Extruders, Emission Unit IDs #13 & #14, with a maximum capacity of 250 lb/hr each;

(i) One (1) Thermoplastic Compounding 1.5" R&D Extruder, Emission Unit ID #15, with a maximum

capacity of 100 lb/hr;

(j) One (1) Thermoplastic Compounding 30 mm R&D Extruder, Emission Unit ID #16, with a maximum capacity of 100 lb/hr;

(k) Nine (9) Resin Mixers, Emission Unit IDs B1 -B9, with a maximum capacity of 1,400 lb/hr each;

(l) One Electric Dryer, Emission Unit ID D1 with maximum capacity of 200 lb/hr;

(m) One Pigment Weigh Hood, Emission Unit ID H1, with maximum capacity of 20 lb/hr;

(n) One Bar Mold Machine, Emission Unit ID M1, with maximum capacity of 100 lb/hr;

(o) Two (2) Color Chip Mold Machines, Emission Unit IDs M2 & M3, with maximum capacity of 100 lb/hr each;

(p) One (1) Resin Blender/Mixer, (Emission Unit B10), with a maximum capacity of 1,000 pounds per hour; and One (1) Resin Blender/Mixer, (Emission Unit B11) with a maximum capacity of 2,200 pounds per hour; both using dust collector (DC-1) as control, exhausting to stack S-1 and receiving approval to construct in February 2004.

Emission Units #1-#12, B1-B9 are using the Cartridge Dust Collector indentified as an Air Control Device DC-1 and are exhausting to Stack S-1.

Emission Units #13-#16, D1, H1, M1-M3 are using the Cartridge Dust Collector indentified as an Air Control Device DC-2 and are exhausting to Stack S-2.

Emission Units #5, #6, and #11 have not been installed yet and are subject to General Construction Conditions, Section B.

The source also consists of the following insignificant (exempted) activities:

(a) Two (2) VLF Extruders (Emission Units ID# 18 and 20) vented to two cartridge dust collectors (Emission Units ID# 19 and 21 respectively). The process has a maximum operating capacity of 800 lb/hr, and a flow rate of 1,900 acfm. The extruders are used to process a plastic resin which consists primarily of polypropylene, polybutylene, ABS and nylon resins;

(b) One Air Classifier (Emission Unit ID#17) with a maximum operating capacity of 3,000 lb/hr, and a flow rate of 7,200 acfm; using the dust collector (DC-3) as control, exhausting to stack S-4.

(c) One IGG-17L Controlled Incinerator (Emission Unit ID# PF-1) with a maximum operating capacity of 0.95 MMBTU/hr. The incinerator is used for cleaning by thermally decomposing the plastic resin on the extruder screws.

(d) One (1) Thermoplastic Long Fiber Resin Extruder with associated cooling bath and chopper, (Emission Unit # 22), with a maximum operating capacity of 420 pounds per hour, exhausting to general ventilation and receiving approval to construct in February 2004.

(e) One (1) Air Classifier, (Emission Unit # 23), with a maximum capacity of 700 pounds per hour, using dust collector (DC-6) as control, exhausting to stack S-7, and receiving approval to construct in February 2004.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

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

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

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

B.5 Modification to Permit [326 IAC 2]

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

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

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

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases, i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions

associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the OES, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees) and the Code of Indianapolis and Marion County, Chapter 511**.**

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Phase Construction Time Frame

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

(a) Construction of Emission Units #5, #6, and #11 has not begun within eighteen (18) months from the effective date of this permit or if during the construction work is suspended for a continuous period of one (1) year or more.

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of PM10 is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

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

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, and OES upon request and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46260

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

(c) The Permittee shall notify the OAQ and OES within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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, and OES**,** U.S. EPA, or an authorized representative to perform the following:

(b) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch**,** and OES, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, and OES shall issue a revised permit.

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

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM and OES the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.8 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.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any

applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

and

OES
Compliance Data
2700 South Belmont Avenue
Indianapolis, IN 46260

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ, and OES within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES, if the source submits to IDEM, OAQ, and OES a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

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

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

C.12 Monitoring Methods [326 IAC 3]

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, or other approved methods as specified in this permit.

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, and OES upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

Record Keeping and Reporting Requirements

C.14 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and OES or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Annual Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

(c) The annual 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, and OES on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM and OES may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and OES representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES make a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

OES
Compliance Data
2700 South Belmont Avenue
Indianapolis, IN 46260

(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, and OES on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality and OES stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

and

OES
Compliance Data
2700 South Belmont Avenue
Indianapolis, IN 46260

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

(a) Four (4) Thermoplastic Compounding 2.5" Extruders, Emission Units IDs #1-#4, with a maximum capacity of 500 lb/hr each.

(b) One (1) Thermoplastic Compounding 53 mm Twin Extruder Emission Unit ID #5.

(c) One (1) Thermoplastic Compounding 70 mm Extruder, Emission Unit ID #6, with a maximum capacity of 1000 lb/hr.

(d) Two (2) Thermoplastic Compounding 3.5" Extruders, Emission Units IDs #7 and #8, with a maximum capacity of 900 lb/hr each.

(e) One (1) Thermoplastic Compounding 57 mm Extruder, Emission Unit ID #9, with a maximum capacity of 700 lb/hr.

(f) One (1) Thermoplastic Compounding 70 mm Extruder, Emission Unit ID #10, with a maximum capacity of 1,000 lb/hr.

(g) Two (2) Thermoplastic Compounding 4.5" Extruders, Emission Unit IDs #11 & #12, with a maximum capacity of 2,200 lb/hr each.

(h) Two (2) Thermoplastic Compounding 2" R&D Extruders, Emission Unit IDs #13 & #14, with a maximum capacity of 250 lb/hr each.

(i) One (1) Thermoplastic Compounding 1.5" R&D Extruder, Emission Unit ID #15, with a maximum capacity of 100 lb/hr.

(j) One (1) Thermoplastic Compounding 30 mm R&D Extruder, Emission Unit ID #16, with a maximum capacity of 100 lb/hr.

(k) Nine (9) Resin Mixers, Emission Unit IDs B1 -B9, with a maximum capacity of 1,400 lb/hr each.

(l) One Electric Dryer, Emission Unit ID D1 with maximum capacity of 200 lb/hr.

(m) One Pigment Weigh Hood, Emission Unit ID H1, with maximum capacity of 20 lb/hr.

(n) One Bar Mold Machine, Emission Unit ID M1, with maximum capacity of 100 lb/hr.

(o) Two (2) Color Chip Mold Machines, Emission Unit IDs M2 & M3, with maximum capacity of 100 lb/hr each.

(p) One (1) Resin Blender/Mixer, (Emission Unit B10), with maximum capacity of 1,000 pounds per hour; One (1) Resin Blender/Mixer, (Emission Unit B11), with maximum capacity of 2,200 lb/hr; both using dust collector (DC-1) as control, exhausting to stack S-1 and receiving approval to construct in February 2004.

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations: Particulate Emissions Limitations), the PM emissions from the twelve (12) Extruders (Emission Units #1 to #12 controlled by Dust Collector DC-1), and the two (2) Extruders (Emission Units #13 and #14 controlled by the Dust Collector DC-2), as stated in the Construction Permit Amendment CP-A099-0316-01 issued on November 17, 1999, shall not exceed the pound per hour emission rate established as E in the following formula below.

Pursuant to 326 IAC 6-3-2, Emission Units B 10 and B 11 as stated in the minor MSOP revision number 097-18659-00316, shall not exceed the pound per hour emisson rate established as E in the formula below:

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

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

The combined process weight rate for the twelve (12) Extruders (Emission Units 1 to 12 controlled by Dust Collector DC-1) is 6 tons per hour. Therefore pursuant to 326 IAC 6-3-2, the allowable emissions rate for the (12) Extruders (Emission Units #1 to #12 controlled by DC-1) is 13.62 pounds per hour.

The combined process weight rate for the two (2) Extruders (Emission Units #13 and #14 controlled by the Dust Collector DC-2) is 0.2 tons per hour. Therefore pursuant to 326 IAC 6-3-2, the allowable emissions rate for the (2) Extruders (Emission Units 13 and 14 controlled by DC-2) is 1.39 pounds per hour.

The combined process weight rate for two (2) Blenders/Mixers (Emission Units B10 and B11 controlled by Dust Collector DC-1), is 1.6 tons per hour. Therefore pursuant to 326 IAC 6-3-2, the allowable emission rate is 5.6175 pounds per hour for the blenders specified above.

D.1.2 Volatile Organic Compounds (VOC) 326 IAC 8-1-6

Any change or modification which may increase VOC emissions to 25 tons per year or more from the equipment covered in this permit will need prior approval in order to comply with 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities).

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for Emissions Units #1-#16, D1, H1, M1-M3 and their control devices (Dust Collectors DC-1 and DC-2).

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emission units by this permit. However, IDEM and OES may require compliance testing when necessary to determine if the emission units are in compliance. If testing is required by IDEM or OES, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.5 Particulate Matter (PM)

Pursuant to CP-097-0316-01, issued on June 30, 1997, and Construction Permit Amendment CP-A099-0316-01, issued on November 17, 1999

(a) the Dust Collectors DC-1and DC-2 shall be operated at all times when the thermoplastic Extruders (Emission units #1 - #16) are in operation.

D.1.6 Visible Emissions Notations

(a) Daily visible emission notations of the Dust Collectors Emission Units DC-1 and DC-2 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of stack exhausts S-1 and S-2.

(b) The Permittee shall maintain records of the amounts of all the materials used, its VOC and HAP content, blending and extrusion production.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

MINOR SOURCE OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: RTP Company
Source Address: 8111 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address: 8111 Zionsville Road, Indianapolis, Indiana 46268
MSOP No.: MSOP 097-11724-00316

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	**RTP Company**
Address:	**8111 Zionsville Road**
City:	**Indianapolis Office of Environmental Services**
Phone #:	**317-802-9813**
MSOP #:	**MSOP 097-11724-00316**

I hereby certify that [source] is ? **still in operation.**
? **no longer in operation.**

I hereby certify that [source] is ? **in compliance with the requirements of MSOP 097-11724-00316.**
? **not in compliance with the requirements of MSOP 097-11724-00316.**

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR Quality
FAX NUMBER - 317 233-5967
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE
FAX NUMBER 317-327-2274

MALFUNCTION REPORT

Page 1 of 2

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ ____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 1 OF 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

_____

_____

Mail to:

Indiana Department of Environmental Management (IDEM)
Office Of Air Quality (OAQ)
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services (OES)
2700 South Belmont Avenue
Indianapolis, IN 46260

RTP Company
Mr. Marshall Akers, General Manager
8111 Zionsville Road
Indianapolis, IN 46268

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with RTP Company, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of RTP Company.
(Company Name)

4. I hereby certify that RTP Company, located at 8111 Zionsville Road, Indianapolis, Indiana, 46268, has constructed the extruder (Emission Unit #22), a cooling bath, a chopper, an air classifier (Emission Unit #23); and, blender/mixer units (Emission Units B10 and B11), in conformity with the requirements and intent of the construction permit application received by the City of Indianapolis, Office of Environmental Services (OES) on January 13, 2004 and as permitted pursuant to Permit No. 097-18659-00316 issued on February__ 2004.

Further Affiant said not.

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

_____
Signature

_____
Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality, and
City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for a MSOP Revision

Source Background and Description

Source Name:	RTP Company
Source Location:	8111 Zionsville Road, Indianapolis, IN 46268
County:	Marion
SIC Code:	3087
Operation Permit No.:	MSOP 097-11724-00316
Operation Permit Issuance Date:	July 13, 2000
Second Permit Revision No.:	MSOP 097-18659-00316
Permit Reviewer:	Carmen Bugay

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed a revision application from RTP Company relating to the construction and operation of additional VLF extrusion line and thermoplastic resin blender/mixers to mix resins and additives (prior to extrusion).

History and Justification

On January 13, 2004, RTP Company submitted an application to the OES requesting a revision to the MSOP. This revision was deemed to be a "minor" one, as per 326 IAC 2-6.1-6 (g) 4 (A), since this project has the potential to emit more than 5 tons per year (tons/yr) but less than 25 tons/year of particulate matter.

Proposed Emission Units

The source will consist of the following proposed emission units in addition to the ones listed in the minor source construction and operating permit numbered MSOP 097-11724-00316, issued on July 13, 2000; and permit revision (notice-only-change) numbered 097-14927-00316, issued on September 19, 2001.

(a) One (1) Thermoplastic Long Fiber Resin Extruder with associated cooling bath and chopper, (Emission Unit #22), with a maximum operating capacity of 420 pounds per hour, exhausting to general ventilation and receiving approval to construct in February 2004.

(b) One (1) Air Classifier, (Emission Unit #23), with a maximum capacity of 700 pounds per hour, using dust collector (DC-6) as control, exhausting to stack S-7, and receiving approval to construct in February 2004.

(c) One (1) Resin Blender/Mixer, (Emission Unit B10), with a maximum capacity of 1,000 pounds per hour; and One (1) Resin Blender/Mixer, (Emission Unit B11), with a maximum capacity of 2,200 pounds per hour; both using dust collector (DC-1) as control, exhausting to stack S-1 and receiving approval to construct in February 2004.

Existing Approvals

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

(a) **MSOP 097-11724-00316,** issued on **July 13, 2000**; and

(b) **Notice-only-change revision 097-14927-00316, issued on September 19, 2001.**

To clarify emission unit description and correct monitoring applicability, the following changes are also being incorporated into this revision.

Section A, Source Summary, A.1 General information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

Authorized Individual: ~~Mr. Ron Miller,~~ General Manager

Phone Number: (317) 802-981~~2~~ **3**

Section A, Source Summary, A.2, insignificant (exempt) activities:

(b) One ~~portable~~ Air Classifier~~/Dust Collector~~ (Emission Unit ID#17) with a maximum operating capacity of 3,000 lb/hr, and a flow rate of 7,200 acfm; **using the dust collector (DC-3) as control, exhausting to stack S-4.**

Section D, Emissions Unit Operation Conditions, D.1.6, Visible Emissions Notations:

Emission unit #17 which vents to DC-3, does not have an applicable particulate limitation, therefore no compliance monitoring is required for this unit. The requirements of 326 IAC 6-3-2 do not apply to emission unit #17, since the potential particulate emissions are less than 0.551 pounds per hour.

(a) Daily visible emission notations of the Dust Collectors Emission Units DC-1 **and** DC-2 ~~and DC-3~~ stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Stack Summary

Stack ID	Operation	Height (ft) above ground	Diameter (ft)	Flow Rate (acfm)	Temperature (^{o}F)
S-1	B10, B11	8	3.3 x 3.3 (rectangular)	45,000	Ambient
S-7	23	approx. 30	1.1 (circular)	1,900	Ambient

Recommendation

The staff recommends to the Commissioner that the minor revision for construction and operation be approved. This recommendation is based on the following facts and conditions:

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

A complete application for the purposes of this review was received on January 13, 2004.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 and 2).

Potential to Emit of the Revision Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM/PM-10	9.152
SO_2	0.0
VOC	0.326
CO	0.0
NO_x	0.0

HAPs	Potential to Emit (tons/yr)
Formaldehyde	0.00254
Acrolein	0.00009
Acetaldehyde	0.00099
Propionaldehyde	0.00013
Methyl Ethyl Ketone	0.00044
Total VO HAPs	0.00419
Antimony	0.260
Cadmium	0.043
Chromium	0.043
Cobalt	0.043
Lead	0.043
Total PM HAPs	0.0303
Total HAPs	**0.03449**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants of particulate matter is greater than 5 tons per year but less than 25 tons per year. Therefore, this change is subject to the provisions of 326 IAC 2-6.1-6 (g) 4 (A).

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO_2	maintenance attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) Marion County has been classified as attainment or unclassifiable for all pollutants listed in table above. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

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

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source. The source is not considered a major source under 40 CFR Part 63, Subpart A, and as such, is not subject to the Subpart WWWW (reinforced plastic composites production).

State Rule Applicability – Entire Source

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

This revision does not increase the PTE to PSD major source level (equal to or more than 250 tons per year). This revision is not major for purposes of PSD, therefore PSD requirements do not apply.

326 IAC 2-7 (Part 70 permit program)

This revision does not increase the Potential to Emit (PTE) to major source level, therefore these requirements do not apply.

No other source-wide applicability has changed as a result of this revision.

State Rule Applicability – Individual Facilities/Emission Units

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

The operation of the thermoplastic resin extruder, cooling bath, chopper, air classifier, and resin blender/mixers, will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-1 (Nonattaiment Area Limitations)

This Thermoplastic Long Fiber Resin Extruder with associated cooling bath and chopper, identified as Emission Unit #22; Air Classifier, identified as Emission Unit #23; and Resin Blender/Mixers, identified as Emission Units B10 and B11, are not subject to the requirements of this regulation, since the source does not have the potential to emit (PTE) one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The emission units listed above are not subject to this regulation, because they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1 (b) (14), the Thermoplastic Long Fiber Resin Extruder with associated cooling bath and chopper, identified as Emission Unit #22; and the Air Classifier, identified as Emission Unit #23 are exempt from this regulation, since each unit has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Pursuant to 326 IAC 6-3-2 (e), the particulate from the Resin Blender/Mixers, identified as Emission Units B10 and B11, shall be limited by the following:

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

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

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

The process weight rate is 3,200 pounds per hour for emission units B10 and B11 combined, therefore the allowable emission rate is 5.6175 pounds per hour. Potential emissions are 1.977 pounds per hour, therefore these emission units will be in compliance with this allowable emission rate.

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

None of the emission units mentioned in this revision have potential emissions of 25 tons or more of VOC per year, therefore they are not subject to this rule.

Conclusion

The construction and operation of this Thermoplastic Long Fiber Resin Extruder with associated cooling bath and chopper, (Emission Unit #22); Air Classifier, (Emission Unit #23); and Resin Blender/Mixers, (Emission Units B10 and B11), shall be subject to the conditions of the Minor Source Operating Permit Minor Revision 097-18659-00316.

Appendix A: Emissions Calculations
Projected Air Emission Increase from Installation of One Additional
VLF Extruder and Air Classifier/Dust Collector

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
Permit Number: MSOP 097-18659-00316
Submitted by: SECOR on behalf of RTP Company, 1/29/04
Reviewed & Verified by: Carmen Bugay, OES, Air Permits, 2/04

Emission Unit#	Emission Unit Description **Type of Emission Factor** Hourly Capacity of Unit	Potential Pollutant(s)	Source of Emission Factor	A Uncontrolled Emission Factor (lb/10^6 lb)	B Maximum Production Rate (10^6 lb product/hr)	C Uncontrolled Potential Emissions A x B (lb/hr)	D Control Efficiency (%)	E Controlled Potential Emissions C x (1-D) (lb/hr)	F Controlled Potential Emissions E x 24 (lb/day)	G Controlled Potential Emissions E x 8760 / 2000 (ton/yr)	H Uncontrolled Potential Emissions C x 8760 / 2000 (ton/yr)
23	Air classification of Long Fibers with dust collection control **Site Specific Emission Factor** 120 lb/1,000,000 lb = 120 lb per 10^6 lb 700 lb/hr total product throughput capacity 700 / 1,000,000 = 0.00070 x 10^6 lb/hr	PM	Site Specific (from process mass balance and particle size distribution analysis)	120.0	0.00070	0.084	99.0%	0.0008	0.020	0.0037	0.368
22	Extrusion onto Long Fibers (glass, graphite carbon, Kevlar, or stainless steel) with polypropylene or nylon resin **Emission Factor - AWMA Journal Polypropylene Extrusion** 420 lb/hr total plastic resin thruput capacity 420 / 1,000,000 = 0.00042 x 10^6 lb/hr	PM	1999 AWMA Journal	68.4	0.00042	0.029	0.0%	0.0287	0.69	0.126	0.126
		VOC		177	0.00042	0.074	0.0%	0.0743	1.78	0.326	0.326
		Formaldehyde	1999 AWMA Journal	1.38	0.00042	0.000580	0.0%	0.00058	0.01391	0.00254	0.00254
		Acrolein		0.05	0.00042	0.000021	0.0%	0.00002	0.00050	0.00009	0.00009
		Acetaldehyde	"	0.54	0.00042	0.000227	0.0%	0.00023	0.00544	0.00099	0.00099
		Propionaldehyde	"	0.07	0.00042	0.000029	0.0%	0.00003	0.00071	0.00013	0.00013
		Methyl Ethyl Ketone	"	0.24	0.00042	0.000101	0.0%	0.00010	0.00242	0.00044	0.00044
		Total VOHAP	1999 AWMA Journal	2.3	0.00042	0.000958	0.0%	0.00096	0.02298	0.00419	0.00419
	Totals for VLF Process	PM				0.113		0.030	0.71	0.130	0.49
		VOC				0.074		0.074	1.78	0.326	0.33
		Formaldehyde				0.00058		0.00058	0.01391	0.00254	0.00254
		Acrolein				0.00002		0.00002	0.00050	0.00009	0.00009
		Acetaldehyde				0.00023		0.00023	0.00544	0.00099	0.00099
		Propionaldehyde				0.00003		0.00003	0.00071	0.00013	0.00013
		Methyl Ethyl Ketone				0.00010		0.00010	0.00242	0.00044	0.00044
		Total VOHAP				0.00096		0.00096	0.02298	0.00419	0.00419

Appendix A: Emissions Calculations
Projected Air Emission Increase from Installation of Two
Additional Product Blenders

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
Permit Number: MSOP 097-18659-00316
Submitted by: SECOR on behalf of RTP Company, 1/29/04
Reviewed & Verified by: Carmen Bugay, OES, Air Permits, 2/04

Emission Unit#	Emission Unit Description **Type of Emission Factor** Hourly Capacity of Unit	Potential Pollutant(s)	Source of Emission Factor	Emission Factor Units	A Uncontrolled Emission Factor (lb/10^6 lb)	B Maximum Production Rate (10^6 lb product/hr)	C Uncontrolled Potential Emissions A x B (lb/hr)	D Control Efficiency (%)	E Controlled Potential Emissions C x (1-D) (lb/hr)	F Controlled Potential Emissions E x 24 (lb/day)	G Controlled Potential Emissions E x 8760 / 2000 (ton/yr)	H Uncontrolled Potential Emissions C x 8760 / 2000 (ton/yr)
B10, B11	Production Blending of Specialty Plastic Resins in Blenders 10 and 11 (blender/mixer positions 5 and 8)	PM	Site Specific	10^6 lb	617.7	0.0032	1.977	99.0%	0.0198	0.47	0.087	8.658
		Antimony	3.0% of PM	10^6 lb	18.5	0.0032	0.059	99.0%	0.0006	0.014	0.0026	0.260
		Cadmium	0.5% of PM	10^6 lb	3.1	0.0032	0.010	99.0%	0.0001	0.0024	0.0004	0.043
	Site Specific Emission Factor	Chromium	0.5% of PM	10^6 lb	3.1	0.0032	0.010	99.0%	0.0001	0.0024	0.0004	0.043
	from Mass Balance of process	Cobalt	0.5% of PM	10^6 lb	3.1	0.0032	0.010	99.0%	0.0001	0.0024	0.0004	0.043
	617.7 lb PM/ 10^6 lb processed	Lead	0.5% of PM	10^6 lb	3.1	0.0032	0.010	99.0%	0.0001	0.0024	0.0004	0.043
	3,200 lb/hr total throughput capacity 3,200 / 1,000,000 = 0.0032 x 10^6 lb/hr	Total PM HAP	3.5% of PM	10^6 lb	21.6	0.0032	0.069	99.0%	0.0007	0.0166	0.0030	0.303