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November 4, 2004

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(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant

RE: APG, Inc. / MSOP 039-19638-00050

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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

Enclosures
FNPER.dot 9/16/03

MINOR SOURCE OPERATING PERMIT (MSOP) RENEWAL OFFICE OF AIR QUALITY

**APG, Inc.
1919 Superior Street
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to 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 039-19638-00050	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 4, 2004 Expiration Date: November 4, 2009

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates consumer product packaging plant.

Authorized Individual: Dan Williams
Source Address: 1919 Superior Street, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2988, Elkhart, Indiana 46516
General Source Phone: (574) 295-0000
SIC Code: 7389
County Location: Elkhart
Source Location Status: Nonattainment area for ozone under the 8-hour standard
Attainment for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD
Minor Source, under Nonattainment NSR
Minor Source, Section 112 of the Clean Air Act

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) Liquid Product Lines, with a total maximum production rate of 1012.5 gallons per hour, which include mixing vessels and process vessels for compounding/mixing and liquid product filling operations.
- (b) Tube/Stick/Other Product Lines, with a total maximum production rate of 680.9 gallons per hour, which includes mixing vessels and process vessels for compounding/mixing operation and tube/stick/other product filling operation;
- (c) Corporate Aerosol Line, with a maximum production rate of 82 gallons per hour, and 3,000 can per hour;
- (d) Seven (7) Volatile Organic Liquid (VOL) Storage Tanks, identified as 31-1, 31-2, 31-3, 31-4, S-1, SA-3, and SA-4. Tanks 31-1 and 31-2 each has a storage capacity of 10,000 gallons, Tanks 31-3 and 31-4 each has a storage capacity of 8,000 gallons, Tank S-1 with a storage capacity of 6,500 gallons, Tank SA-3 and SA-4 each has a capacity of 6,000 gallons;
- (e) Four (4) Pressure Propellant Tanks, identified as P-1, P-2, P-3, and P-4. Each tank has a capacity of 500 gallons;
- (f) Various Compounding/Mixing Tanks (Batch Tanks):
 - (1) Three (3) batch tanks, identified as Tank OBT01, Tank OBT03, and Tank10 each has a capacity of 500 gallons;

- (2) Two (2) batch tanks, identified as C and D each has a capacity of 425 gallons;
 - (3) One (1) batch tank, identified as Tank 9 with a capacity of 3,800 gallons;
 - (4) One (1) batch tank, identified as Tank 11 with a capacity of 35 gallons;
 - (5) Two (2) batch tanks, identified as MT#1 and 21BT6 each has a capacity of 200 gallons;
 - (6) One (1) batch tank, identified as Tank17 with a capacity of 1,000 gallons;
 - (7) One (1) batch tank, identified as Tank MT#2 with a capacity of 300 gallons;
 - (8) One (1) batch tank, identified as Tank MT#3 with a capacity of 100 gallons;
 - (9) One batch tank, identified as Tank CP8 with a capacity of 125 gallons;
 - (10) Three (3) batch tanks, identified as Tank 109-1, Tank 109-2, and Tank 109-3, each has a capacity of 3,000 gallons;
 - (11) Three batch tanks, identified as Tank C, Tank D, and Tank 107-3 each has a capacity of 400 gallons;
 - (12) Two (2) batch tanks, identified as Tank 31-5 and Tank 31-6 each has a capacity of 10,000 gallons;
 - (13) Two (2) batch tanks, identified as 21BT5 and CP7 each has a capacity of 1100 gallons; and
 - (14) Two (2) batch tanks, identified as Tank 107-1 and Tank 107-2 each has a capacity of 1060 gallons.
- (g) Various Holding Tanks (Run Tanks):
- (1) Five (5) run tanks, identified as Tank 12, Tank ID13, Tank ID14, Tank 21BT7, and Tank 21BT8 each has a capacity of 1,360 gallons;
 - (2) One (1) run tank, identified as Tank K with a capacity of 250 gallons;
 - (3) One (1) run tank, identified as Tank 1231 with a capacity of 175 gallons;
 - (4) One (1) run tank, identified as Tank 15 with a capacity of 125 gallons;
 - (5) Two (2) run tanks, identified Tank OBT02 and Tank L each has a capacity of 500 gallons; and
 - (6) One (1) run tank, identified as Tank16 with a capacity of 200 gallons.
- (h) Three (3) natural gas-fired boilers, each has a maximum heat input capacity of 300 Horsepower (10.06 million British thermal units/hr), and one (1) natural gas- fired boiler with a maximum heat input capacity of 150 Horsepower (5.03 million British thermal units/hr). All boilers were installed in 1968.

A.3 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 not a major source, as defined in 326 IAC 2-7-1(22);

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

B.2 Definitions

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 2-1.1-1 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 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

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

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

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

B.7 Preventive Maintenance Plan [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) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

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

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

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Fugitive Dust Emissions [326 IAC 6-4]

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

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved

by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.6 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.7 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.

Record Keeping and Reporting Requirements

C.8 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.9 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

EMISSIONS UNITS OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-1]

- (a) Liquid Product Lines, with a total maximum production rate of 1012.5 gallons per hour, which include mixing vessels and process vessels for compounding/mixing and liquid product filling operations.

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8- 1-6]

The Liquid Product Line operation is not subject to 326 IAC 8-1-6 (New Facilities: Reduction Requirements, as the VOC potential emissions is less than 25 tons per year. Any change or modification from this line that would increase the potential VOC emissions to 25 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ) before such change may occur.

D.1.2 Hazardous Air Pollutants [326 IAC 2-4.1-1] [326 IAC 2-7]

The Liquid Product Line operation is not subject to 326 IAC 2-4.1-1 (New Source Toxic Control) and the source is not subject to 326 IAC 2-7 (Part 70 Operating Permit), as the single hazardous air pollutants (HAP) is less than the major level of 10 tons per year, and combined HAPs is less than 25 tons per year. Any reconstruction made to this production line, or change or modification made to the source that would increase the single HAP to 10 tons per year or combined HAPs to 25 tons per year shall require prior approval from the Office of Air Quality (OAQ) before such change may occur.

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

D.1.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in D.1.1 and D.1.2
- (1) The amount and VOC and HAP content of the VOL product filled. Records shall include material safety data sheets (MSDS), product formulation information;
 - (2) VOL compounded/filled for each month and company product records necessary to verify the type and amount used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-1]

- (b) Tube/Stick/Other Product Lines, with a total maximum production rate of 680.9 gallons per hour, which includes mixing vessels and process vessels for compounding/mixing operation and tube/stick/other product filling operation;

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

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The Tube/Stick/Other Product Line operation is not subject to 326 IAC 8-1-6 (New Facilities: Reduction Requirements, as the VOC potential emissions is less than 25 tons per year. Any change or modification from this line that would increase the potential VOC emissions to 25 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ) before such change may occur.

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

D.2.2 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (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 D.2.1
 - (1) The amount and VOC content of the VOL product filled. Records shall include material safety data sheets (MSDS), product formulation information;
 - (2) VOL compounded/filled for each month and company product records necessary to verify the type and amount used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-1]

- (c) Corporate Aerosol Line, identified as Line ID40, with a maximum production rate 82 gallons per hour, and 3,000 can per hour;
- (e) Four (4) Pressure Propellant Tanks, identified as P-1, P-2, P-3, and P-4. Each tank has a capacity of 500 gallons;

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

Emission Limitations and Standards

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8- 1-6]

The Corporate Aerosol Line is not subject to 326 IAC 8-1-6 (New Facilities: Reduction Requirements, as the VOC potential emissions is less than 25 tons per year. Any change or modification from this line that would increase the potential VOC emissions to 25 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ) before such change may occur.

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

D.3.2 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records of the amount of VOC product, propellant and cans filled. Records 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 D.3.1
 - (1) Records shall include material safety data sheets (MSDS);
 - (2) VOC compounded/filled for each month and company product records necessary to verify the type and amount used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit

SECTION D.4

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-1]

- (h) Three (3) natural gas-fired boilers, each has a maximum heat input capacity of 300 Horsepower (10.06 million British thermal units/hr), and one (1) natural gas-fired boiler with a maximum heat input capacity of 150 Horsepower (5.03 million British thermal units/hr). All boilers were installed in 1968.

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

Emission Limitations and Standards

D.4.1 Particulate Emissions Limit [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the three (3) 10.06 mmBtu per hour heat input boilers, and from one (1) 5.03 mmBtu per hour shall each be limited to 0.64 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{C * a * h}{6.5 * Q^{0.75} * N^{0.25}}$$

where:

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

**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:	APG, Inc.
Address:	1919 Superior Street
City:	Elkhart
Phone #:	(574) 295-0000
MSOP #:	039-19638-00050

I hereby certify that **APG, Inc.** is still in operation.
 no longer in operation.

I hereby certify that **APG, Inc.** is in compliance with the requirements of **MSOP 039-19638-00050**.
 not in compliance with the requirements of **MSOP 039-19638-00050**.

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

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP) Renewal

Source Background and Description

Source Name: APG, Inc.
Source Location: 1919 Superior Street, Elkhart, Indiana 46516
County: Elkhart
SIC Code: 7389
Renewal Permit No.: 039-19638-00050
Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed an application from APG, Inc. relating to the renewal permit for the operation of a consumer product packaging plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Liquid Product Lines, with a total maximum production rate of 1012.5 gallons per hour, which include mixing vessels and process vessels for compounding/mixing and liquid product filling operations.
- (b) Tube/Stick Product Lines, with a total maximum production rate of 680.9 gallons per hour, which includes mixing vessels and process vessels for compounding/mixing operation and tube/stick product filling operation;
- (c) Corporate Aerosol Line, with a maximum production rate of 82 gallons per hour, and 3,000 can per hour;
- (d) Seven (7) Volatile Organic Liquid (VOL) Storage Tanks, identified as 31-1, 31-2, 31-3, 31-4, S-1, SA-3, and SA-4. Tanks 31-1 and 31-2 each has a storage capacity of 10,000 gallons, Tanks 31-3 and 31-4 each has a storage capacity of 8,000 gallons, Tank S-1 with a storage capacity of 6,500 gallons, Tank SA-3 and SA-4 each has a capacity of 6,000 gallons;
- (e) Four (4) Pressure Propellant Tanks, identified as P-1, P-1, P-3, and P-4. Each tank has a capacity of 500 gallons;
- (f) Various Compounding/Mixing Tanks (Batch Tanks):
 - (1) Three (3) batch tanks, identified as Tank OBT01, Tank OBT03, and Tank10 each has a capacity of 500 gallons;
 - (2) Two (2) batch tanks, identified as C and D each has a capacity of 425 gallons;
 - (3) One (1) batch tank, identified as Tank 9 with a capacity of 3,800 gallons;
 - (4) One (1) batch tank, identified as Tank 11 with a capacity of 35 gallons;
 - (5) Two (2) batch tanks, identified as MT#1 and 21BT6 each has a capacity of 200

- gallons;
 - (6) One (1) batch tank, identified as Tank17 with a capacity of 1,000 gallons;
 - (7) One (1) batch tank, identified as Tank MT#2 with a capacity of 300 gallons;
 - (8) One (1) batch tank, identified as Tank MT#3 with a capacity of 100 gallons;
 - (9) One batch tank, identified as Tank CP8 with a capacity of 125 gallons;
 - (10) Three (3) batch tanks, identified as Tank 109-1, Tank 109-2, and Tank 109-3, each has a capacity of 3,000 gallons;
 - (11) Two batch tanks, identified as Tank C and Tank D each has a capacity of 400 gallons;
 - (12) Two (2) batch tanks, identified as Tank 31-5 and Tank 31-6 each has a capacity of 10,000 gallons; and
 - (13) Two (2) batch tanks, identified as 21BT5 and CP7 each has a capacity of 1100 gallons.
- (g) Various Holding Tanks (Run Tanks):
- (1) Five (5) run tanks, identified as Tank 12, Tank ID13, Tank ID14, Tank 21BT7, and Tank 21BT8 each has a capacity of 1,360 gallons;
 - (2) One (1) run tank, identified as Tank K with a capacity of 250 gallons;
 - (3) One (1) run tank, identified as Tank 1231 with a capacity of 175 gallons;
 - (4) One (1) run tank, identified as Tank 15 with a capacity of 125 gallons;
 - (5) Two (2) run tanks, identified Tank OBT02 and Tank L each has a capacity of 500 gallons;
 - (6) One (1) run tank, identified as Tank16 with a capacity of 200 gallons; and
- (h) Three (3) natural gas-fired boilers, each has a maximum heat input capacity of 300 Horsepower (10.06 million British thermal units/hr), and one (1) natural gas- fired boiler with a maximum heat input capacity of 150 Horsepower (5.03 million British thermal units/hr). All boilers were installed in 1968.

Existing Approvals

The source has been operating under MSOP 039-10527-00050, issued on October 5, 1999 including, but not limited to, the following:

- (a) Third Notice-Only Change 039-18802, issued on April 6, 2002;
- (b) Second Notice-Only Change 039-15734, issued on July 2, 2002; and
- (c) First Notice-Only Change 039-11498, issued on November 10, 1999.

Recommendation

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

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

A complete application for the purposes of this review was received on July 1, 2004, with additional information received on July 27, 2004 and August 12, 2004.

Emission Calculations

- (a) Product Filling and Packaging Operation:
See Page 1 of TSD Appendix A for detailed emission calculations.
- (b) Seven (7) Storage Tanks:
See Tanks 4.0 Program Spreadsheets for detailed emission calculations.

- (c) **Four (4) Propane Tanks:**
 These tanks are highly pressurized, designed to operate in excess of 204.9 kPa without emissions to the atmosphere.
- (d) **Cake Icing Line:**
 There is no VOC or HAP coming from this operation, as the materials used do not contain any VOC or HAP.

PM/PM10 emission is negligible, which is coming from the pouring/dumping of the powdered ingredients into the mixing vessels. Once powdered ingredients are mixed there is no PM/PM10 loss, since mixing is done in closed gasket and sealed mixing vessels.

- (e) **Natural Gas Combustion:**
 - (1) Three (3) boilers with heat input capacity of 300 hp (10.06 mmBtu/hr) each: See page 2 and 3 of 5 TSD Appendix A for detailed emission calculations.
 - (2) One (1) boiler with heat input capacity of 150 hp (5.03 mmBtu/hr): See page 4 and 5 of 5 TSD Appendix A for detailed emission calculations.

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	0.3
PM-10	1.2
SO ₂	0.1
VOC	72.22
CO	13.0
NO _x	15.4

HAP's	Potential To Emit (tons/year)
Benzene	3.23E-04
Dichlorobenzene	1.85E-04
Formaldehyde	1.16E-02
Hexane	2.8E-01
Toluene	5.24E-04
Lead	7.7E-05
Cadmium	1.7E-05
Chromium	2.2E-04
Manganese	5.9E-05
Nickel	3.23E-04
Glycol Ether	7.98
TOTAL Combined HAPs	8.27
Worst Single HAP (Hexane)	8.26

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) are greater than 25 tons per year, but less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1, Minor Source Operating Permit.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten

(10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Product Filling and Packaging	0.0	0.0	0.0	70.34	0.0	0.0	7.98
Storage Tanks	0.0	0.0	0.0	1.09	0.0	0.0	0.0
Boilers	0.3	1.2	0.1	0.8	13.0	15.4	0.29
Pressure Tanks	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Emissions	0.3	1.2	0.1	72.23	13.0	15.4	8.27

- (a) The source is **not** an existing major source because Volatile Organic Compounds, a nonattainment pollutant for the 8- hour ozone, is not emitted at a rate of 100 tons per year, and it is not one of the twenty-eight listed source categories.
- (b) The source is **not** an existing source under 326 IAC 2-2, Prevention of Significant Deterioration (PSD) because all the other criteria pollutants are not emitted at a rate of 250 tons per year, and it is not one of the twenty-eight listed source categories.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
8-Hour Ozone	nonattainment
CO	attainment
Lead	not established

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (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 emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as a nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as attainment or unclassifiable for all the other criteria

pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

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

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60):
 - (1) 40 CFR Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984 applies to each storage vessel, with a capacity greater than 40 m³ (10,567 gallons).
 - (A) VOL Storage Tanks 31-1, 31-2, 31-3, 31-4, S1, SA-3, and SA-4 are not subject 40 CFR Part 60, Subpart Kb, as each tank's capacity is less than 40 m³ (10,567 gallons).
 - (B) Pressure Tanks P-1, P-1, P-3, and P-4 are exempted from 40 CFR Part 60, Subpart Kb, as they are designed to operate in excess of 204.9 kPa and without emissions to the atmosphere.
 - (C) Various Holding Tanks and Mixing Tanks are not subject to 40 CFR Part 60, Subpart Kb because these tanks are process tanks and are not storage tanks.
 - (2) 40 CFR § 60.660, Subpart NNN - Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations.

This NSPS applies to each distillation unit for which Construction, Modification or Reconstruction commenced after December 30, 1983 that produces any chemical or compounds listed in this NSPS as a product, co-product, by-product or intermediate product.

APG, Inc. is not subject to 40 CFR Part 60.660, Subpart NNN because it does not involve any chemical or compound production. APG, Inc. operations mainly involve chemical compounding/mixing and packaging of consumer products.

- (3) 40 CFR § 60.700, Subpart RRR - Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.

This NSPS applies to each reactor process for which Construction, Modification or Reconstruction commenced after June 29, 1990 that produces any chemical or compounds listed in this NSPS as a product, co-product, by-product or intermediate product.

The APG, Inc. is not subject to 40 CFR Part 60.700, Subpart RRR because it does

not involve any chemical or compound production. APG, Inc. operations mainly involve chemical compounding/mixing and packaging of consumer products.

- (4) 40 CFR § 60.40c, Subpart Dc -Standards of Performance for Small Industrial, Commercial-Institutional Steam Generating Unit. This NSPS applies to each steam generating unit for which construction, modification or reconstruction is commenced after June 9, 1989 and has a maximum heat input capacity of 100 mmBtu/hr or less but greater than or equal to 10 mmBtu/hr.

The three (3) natural gas-fired boilers each has a heat input capacity of 10.06 mmBtu/hr are not subject 40 CFR § 60.40c, Subpart Dc, as they were constructed around the time they were registered in April 26, 1982, which is before the applicability date of June 9, 1989.

- (5) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63)
 - (1) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in the permit for this source.

State Rule Applicability - Entire Source

- (a) 326 IAC 2-6 (Emission Reporting)
The Emission Reporting under 326 IAC 2-6 applies to Part 70 sources, sources located in Porter and Lake counties that emit 25 tons of VOC or NOx, and sources that emits lead into the atmosphere at levels equal to or greater than 5 tons per year.

APG, Inc. is not subject to the Emission Reporting requirement under 326 IAC 2-6, as it is not a Part 70 source, it is not located in Lake county or Porter county, and it does not emit lead at all into the atmosphere.

- (b) 326 IAC 2-4.1-1 (New Source Toxic Control)
This rule applies to owners who construct or reconstruct a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, including owners or operators with permit applications pending with IDEM on the effective date of this section.

The source which was permitted as a new source in 1999 is not subject to 326 IAC 2-4.1-1, as the source is not a major source for HAP.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 8 (Volatile Organic Sources)
There is no rule in article 326 IAC 8 that applies to this consumer product packaging plant, as it does not match any of the operations listed in this article.
- (b) 326 IAC 8-1-6 (General Reduction Requirements)
In the original MSOP, each line from the Liquid Filling Operation and Aerosol can Filling has a potential VOC emissions of greater than 25 tons per year and each was limited to less than 25 tons per year to avoid the applicability of 326 IAC 8-1-6. The source however, did not construct all the lines originally permitted in the MSOP. That is why in this MSOP Renewal, each line's potential to emit is below 25 tons per year, thus making each line not subject anymore to 326 IAC 8-1-6.
- (c) 326 IAC 6-2-3 (PM Emissions Limitation for Indirect Heating Units)
The three (3) 10.06 mmBtu/hr boilers and one (1) 5.03 mmBtu/hr boiler are subject to 326

IAC 6-2-3, as they were built in 1968, which is before the rule applicability date of September 21, 1983.

The Particulate emissions from the four (4) boilers shall be limited by the following equation:

$$\begin{aligned}
 Pt &= \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}} \\
 &= \frac{50 * 0.67 * 25.1}{76.5 * 35.21^{0.75} * 2^{0.25}} \\
 &= 0.64 \text{ lb/mmBtu (each boiler). Each boiler is in compliance as each emit} \\
 &= 0.002 \text{ lb/mmBtu, which is less than the limit.}
 \end{aligned}$$

Where:

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter (F/m^3) for a period not to exceed sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu)

Q = Total source maximum operating capacity rating in million Btu 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 operation 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.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$\begin{aligned}
 h &= \frac{\sum (H_i * pa_i * Q) \text{ from 1 thru N}}{\sum (pa_i * Q) \text{ from 1 thru N}} \\
 &= \frac{(25 * 0.0019 * 10.06) + (25 * 0.0019 * 10.06) + (25 * 0.0019 * 10.06) + (25 * 0.0019 * 5.03)}{(0.0019 * 10.06) + (0.0019 * 10.06) + (0.0019 * 10.06) + (0.0019 * 5.03)} \\
 &= 25.1 \text{ feet}
 \end{aligned}$$

Where:

pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data.

Using natural gas for fuel:
 1.9 lb/MMCF * 1 MMCF/1000 mmBtu = 0.0019 lb/mmBtu

Conclusion

The operation of this consumer products packaging plant shall be subject to the conditions of the attached **Minor Source Operating Permit Renewal 039-19639-00050**.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a MSOP Renewal

Source Name: APG, Inc.
 Source Location: 1919 Superior Street, Elkhart, Indiana 46516
 County: Elkhart
 SIC Code: 7389
 MSOP Renewal No.: MSOP 039-19638-00050
 Permit Reviewer: Aida De Guzman

On September 10, 2004, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, in Elkhart Indiana, stating that APG, Inc. had applied for a MSOP Renewal for the operation of the consumer product packaging plant. 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.

APG, Inc. had made the following comments to the proposed MSOP Renewal (additions are **bolded** and deletions are ~~struck through~~ for emphasis):

Comment 1: A.1, page 4 of 16: Please make a change in the address, and SIC code, and delete "ext 5555" from the General Source Phone Listing. The correct address is "1919" Superior Street and the SIC code is 7389.

Response 1: Corrections will be made as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a consumer product packaging plant.

Authorized Individual: Dan Williams
 Source Address: ~~9198~~ **1919** Superior Street, Elkhart, Indiana 46516
 Mailing Address: P.O. Box 2988, Elkhart, Indiana 46516
 General Source Phone: (574) 295-0000 ~~ext 5555~~
 SIC Code: ~~(4-digit SIC code, list all major SIC codes that apply)~~ **7389**
 County Location: Elkhart
 Source Location Status: Nonattainment area for ozone under the 8-hour standard
 Attainment for all other criteria pollutants
 Source Status: Minor Source Operating Permit
 Minor Source, under PSD ~~or Emission Offset Rules;~~
Minor Source, under Nonattainment NSR
 Minor Source, Section 112 of the Clean Air Act

Comment 2: A.2(b), Page 4 of 16: Please change "Tube/Stick" to "Tube/Stick/Other" products so that this emissions unit includes the PGC/Other Line 41 production and Cake Icing Line 20 production indicated in the permit renewal application.

Response 2: Section A.2(b) and Section D.2 will be changed to include the PGC/Other Line 41 production and Cake Icing Line 20 production as follows:

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)
- (b) Tube/Stick/**Other** Product Lines, with a total maximum production rate of 680.9 gallons per hour, which includes mixing vessels and process vessels for compounding/mixing operation and tube/stick/**other** product filling operation;

SECTION D.2

Facility Description [326 IAC 2-6.1-1]

- (b) Tube/Stick/**Other** Product Lines, with a total maximum production rate of 680.9 gallons per hour, which includes mixing vessels and process vessels for compounding/mixing operation and tube/stick/**other** product filling operation;

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

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The Tube/Stick/**Other** Product Line operation is not subject to 326 IAC 8-1-6 (New Facilities: Reduction Requirements, as the VOC potential emissions is less than 25 tons per year. Any change or modification from this line that would increase the potential VOC emissions to 25 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ) before such change may occur.

Comment 3: A.2(f), Page 5 of 16: Please add additional batch tank 107-3 with a capacity of 400 gallons to the description in A.2(f)(11); and add a new A.2(f)(14) for two (2) batch tanks, identified as Tank 107-1 and Tank 107-2 each has a capacity of 1060 gallons.

Response 3: The request to add three (3) batch tanks will not result in significant VOC emissions that will make the source subject to the next higher permit level. Therefore, the proposed MSOP will be changed as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (f) Various Compounding/Mixing Tanks (Batch Tanks):
 - (1) Three (3) batch tanks, identified as Tank OBT01, Tank OBT03, and Tank10 each has a capacity of 500 gallons;
 - (2) Two (2) batch tanks, identified as C and D each has a capacity of 425 gallons;
 - (3) One (1) batch tank, identified as Tank 9 with a capacity of 3,800 gallons;
 - (4) One (1) batch tank, identified as Tank 11 with a capacity of 35 gallons;
 - (5) Two (2) batch tanks, identified as MT#1 and 21BT6 each has a capacity of 200 gallons;
 - (6) One (1) batch tank, identified as Tank17 with a capacity of 1,000 gallons;
 - (7) One (1) batch tank, identified as Tank MT#2 with a capacity of 300 gallons;
 - (8) One (1) batch tank, identified as Tank MT#3 with a capacity of 100 gallons;
 - (9) One batch tank, identified as Tank CP8 with a capacity of 125 gallons;

- (10) Three (3) batch tanks, identified as Tank 109-1, Tank 109-2, and Tank 109-3, each has a capacity of 3,000 gallons;
- (11) ~~Two~~ **Three (3)** batch tanks, identified as Tank C ~~and~~ Tank D, and **Tank 107-3** each has a capacity of 400 gallons;
- (12) Two (2) batch tanks, identified as Tank 31-5 and Tank 31-6 each has a capacity of 10,000 gallons; ~~and~~
- (13) Two (2) batch tanks, identified as 21BT5 and CP7 each has a capacity of 1100 gallons; **and**
- (14) **Two (2) batch tanks, identified as Tank 107-1 and Tank 107-2 each has a capacity of 1060 gallons.**

Comment 4: D.1, Page 12 of 16: There is a typographical error in the heading, please make corrections.

Response 4: Section D.1 will be corrected as follows:

SECTION D.1 EMISSIONS-EMISSIONS UNITS OPERATION CONDITIONS

Comment 5: D.1.3, Page 12 of 16; D.2.2, page 13 of 16; and D.3.2, Page 14 of 16: Please delete the **Record Keeping and Reporting Requirements Sections**. Since there are no applicable VOC or HAP emission requirements for the source emission units due to the below threshold potential emissions, the record keeping and reporting requirements are not applicable.

Response 5: Emission units in Sections D.1, D.2, and D.3 do not have VOC applicable requirements under the state VOC rules 326 IAC 8. However, to ensure the rule applicability thresholds are not exceeded, record keeping of VOC usage are required.

Record keeping of the HAP usage in Section D.1, Condition D.1.2 was also required to make sure the actual emissions are continuously below the applicability thresholds of 326 IAC 2-4.1-1 and 326 IAC 2-7, Part 70 permit. No reporting of the VOC and HAP usages are required in the proposed MSOP.

Therefore, record keeping of VOC and HAP usages is necessary in this case, and will remain in the permit

Comment 6: D.2(b) and D.2.1, Page 13 of 16: Please change "Tube/Stick" to see related comment 2.

Response 6: Please see Response 2.

Comment 7: Annual Notification, Page 16 of 16: Please delete "ext 5555" from the Phone # Listing.

Response 7: The Annual Notification will be changed to remove "ext 5555" from the Phone # Listing as follows:

**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:	APG, Inc.
Address:	1919 Superior Street
City:	Elkhart
Phone #:	(574) 295-0000 ext. 5555
MSOP #:	039-19638-00050

I hereby certify that **APG, Inc.** is still in operation.
 no longer in operation.

I hereby certify that **APG, Inc.** is in compliance with the requirements of MSOP **039-19638-00050**.
 not in compliance with the requirements of MSOP **039-19638-00050**.

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

Technical Support Document (TSD)

Comment 1: Permitted Emission Units, Page 1 and 2 of 8: Please incorporate the changes indicated above in the above Comment 2 and 3.

Response 1: The OAQ prefers not to change the TSD because the TSD preserves the history and integrity of the permitting process. However, the TSD Addendum denotes changes to the permit.

Comment 2: Potential to Emit, Page 3 of 8: In the table, please increase the VOC potential emissions by 0.41 tons/yr in the Tube/Stick/Other Filling. The 0.41 ton/yr is for the PGC/Other Line 41.

Also in the table, the “Worst Single HAP (Hexane) 8.26 tons/year” appears to be in error. Shouldn’t it be Glycol Ether 7.98 tons/year?

Response 2: The VOC potential emissions for the Tube/Stick/Other Filling will be changed to add 0.41 tons/yr for the PGC/Other Line 41. Also, the Potential to Emit table will be amended since the worst single HAP was in error. Amendment is as follows:

Facility	Throughput (gal/hour)	Emissions Factor (lb VOC/gal VOC)	% VOC	HAP Uncontrolled/ Controlled Emissions (tons/year)	VOC Uncontrolled Emissions (tons/year)
LIQUID FILLING					
Cough Syrup Line 21A	125.0	0.018	5.0%	0.00	7.391
JFP/MMA Line 21B	187.5	0.018	35.0%	0.00	5.174
Dawn Line 31	700.0	0.018	20.0%	0.00	11.038
Total Throughput	1012.5	0.018	10% glycol ether	7.98	23.603
TUBE/STICK/ OTHER FILLING		0.018			
CBF Line 23	117.2	0.018	75.0%	0.00	6.930
Cascade Line 24	187.5	0.018	75.0%	0.00	11.087
COP Line 26	109.4	0.018	40.0%	0.00	3.450
Ambi Line 28	62.5	0.018	20.0%	0.00	0.986
Dep Line 33	93.8	0.018	10.0%	0.00	0.740
PGC/Other Line 41	10.5	0.018	50%	0.00	0.414
SUB-TOTAL				0.00	23.606 23.192
AEROSOL FILLING					
Liquid Filling	82.0	0.018	100.0%	0.00	6.465
Propellant Filling	3000.0	0.0013	100.0%	0.00	1 7.082
SUB-TOTAL				0.00	23.55
TOTAL				7.98	70.755 -70.342

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control

equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/year)
PM	0.3
PM10	1.2
SO ₂	0.1
VOC	72.22 73.04
CO	13.0
NOx	15.4

Pollutant	Potential to Emit (tons/year)
Benzene	3.23E-04
Dichlorobenzene	1.85E-04
Formaldehyde	1.16E-02
Hexane	2.8E-01
Toluene	5.24E-04
Lead	7.7E-05
Cadmium	1.7E-05
Chromium	2.2E-04
Manganese	5.9E-05
Nickel	3.23E-04
Glycol Ether	7.98
Total Combined HAPs	8.27
Worst Single HAP (Hexane Glycol Ether)	8.26 7.98

IDEM, OAQ has made the following changes to the proposed MSOP (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

- (1) Part of Condition D.3.2(a)(1) was inadvertently left out in the proposed MSOP, it will be corrected as follows:

D.3.2 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records of the amount of VOC product, propellant and cans filled. Records 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 D.3.1
 - (1) ~~The led.~~ Records shall include material safety data sheets (MSDS);
 - (2) VOC compounded/filled for each month and company product records necessary to verify the type and amount used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit
- (2) Section A.2(e) and Section D.3 emission unit in item (e) have misidentified P-2 into P-1, corrections will be corrected as follows:
 - A.2
 - (e) Four (4) Pressure Propellant Tanks, identified as P-1, ~~P-1~~ **P-2**, P-3, and P-4. Each tank

has a capacity of 500 gallons;

Facility Description [326 IAC 2-6.1-1]

- (c) Corporate Aerosol Line, identified as Line ID40, with a maximum production rate 82 gallons per hour, and 3,000 can per hour;
- (e) Four (4) Pressure Propellant Tanks, identified as P-1, ~~P-1~~, ~~P-2~~, P-3, and P-4. Each tank has a capacity of 500 gallons;

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

- (3) The following condition will be changed to clarify when 326 IAC 2-4.1-1 is triggered.

D.1.2 Hazardous Air Pollutants [326 IAC 2-4.1-1 [326 IAC 2-7]

The Liquid Product Line operation is not subject to 326 IAC 2-4.1-1 (New Source Toxic Control) **and the source is not subject to** 326 IAC 2-7 (Part 70 Operating Permit), as ~~its~~ **the** single hazardous air pollutants (HAP) is less than the major level of 10 tons per year, and combined HAPs is less than 25 tons per year. Any reconstruction **made to this production line**, or change or modification made **to the source** ~~this line~~ that would increase the single HAP to 10 tons per year or combined HAPs to 25 tons per year shall require prior approval from the Office of Air Quality (OAQ) before such change may occur.

**VOC Emissions
Product Filling and Packaging Plant**

Company Name: APG, Inc.
Address City IN Zip: 1919 Superior Street, Elkhart, IN 46516
MSOP Renewal: 039-19638
Pit ID: 039-00050
Reviewer: Aida De Guzman
Date Application Received: "July 1, 2004

Facility	Throughput (gal/hour)	Emissions Factor (lb VOC/gal VOC)	% VOC	HAP Uncontrolled/Controlled Emissions (tons/year)	VOC Uncontrolled/Controlled (tons/year)
LIQUID FILLING					
Cough Syrup Line 21A	125.0	0.018	75.0%	0.00	7.391
JFP/MMA Line 21B	187.5	0.018	35.0%	0.00	5.174
Dawn Line 31	700.0	0.018	20.0%	0.00	11.038
Total Throughput	1012.5	0.018	10% glycol ether	7.98	23.603
TUBE/STICK/OTHER FILLING					
CBF Line 23	117.2	0.018	75.0%	0.00	6.930
Cascade Line 24	187.5	0.018	75.0%	0.00	11.087
COP Line 26	109.4	0.018	40.0%	0.00	3.450
Ambi Line28	62.5	0.018	20.0%	0.00	0.986
Dep Line 33	93.8	0.018	10.0%	0.00	0.740
PGC/Other Line 41	10.5	0.018	50.0%	0.00	0.414
SUB-TOTAL				0.00	23.606
AEROSOL FILLING					
Liquid Filling	82.0	0.018	100.0%	0.00	6.465
Propellant Filling	3000.0	0.0013	100.0%	0.00	17.082
SUB-TOTAL				0.00	23.55
TOTAL				7.98	70.755

Note: Throughput for the Propellant Filling is in cans/hour, and the emission factor is in lb VOC/can.

Methodology:

Propellant VOC uncontrolled, t/y = throughput, cans/hr * Ef, lb VOC/can * % VOC * 8706/2000

VOC or HAP Uncontrolled, t/y = throughput, gal/hr * Ef, lb/lb * % VOC or %HAP * 8760 hrs/yr/2000 lb

VOC or HAP Controlled, t/yr = VOC or HAP Uncontrolled (since there are no controls)

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

Company Name: APG, Inc.
Address City IN Zip: 1919 Superior Street, Elkhart, IN 46516
MSOP Renewal Number: 039-19638
Pit ID: 039-00050
Reviewer: Aida De Guzman
Date Application Received: 1-Jul-04

3 boilers @ 10.06 mmBtu/hr (300 hp)

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
30.2	264.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.3	1.0	0.1	13.2	0.7	11.1

*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 page 2 for HAPs emissions calculations.

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

Company Name: APG, Inc.
Address City IN Zip: 1919 Superior Street, Elkhart, IN 46516
Permit Number: 039-19638
Pit ID: 039-00050
Reviewer: Aida De Guzman
Date: 1-Jul-04

3 boilers @ 10.06 mmBtu/hr (300 hp)

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	2.776E-04	1.586E-04	9.914E-03	2.379E-01	4.494E-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
Potential Emission in tons/yr	6.609E-05	1.454E-04	1.851E-04	5.023E-05	2.776E-04

Methodology is the same as page 1.

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

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

Company Name: APG, Inc.
Address City IN Zip: 1919 Superior Street, Elkhart, IN 46516
MSOP Renewal Number: 039-19638
Pit ID: 039-00050
Reviewer: Aida De Guzman
Date Application Received: 1-Jul-04

1 boiler @ 5.03 mmBtu/hr (150 hp)

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.0

44.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.2	0.0	2.2	0.1	1.9

*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 page 2 for HAPs emissions calculations.

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

Company Name: APG, Inc.
Address City IN Zip: 1919 Superior Street, Elkhart, IN 46516
Permit Number: 039-19638
Pit ID: 039-00050
Reviewer: Aida De Guzman
Date: 1-Jul-04

1 boiler @ 5.03 mmBtu/hr (300 hp)

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	4.627E-05	2.644E-05	1.652E-03	3.966E-02	7.491E-05

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
Potential Emission in tons/yr	1.102E-05	2.423E-05	3.084E-05	8.372E-06	4.627E-05

Methodology is the same as page 1.

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