



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

August 19, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
RE: Poly Hi Solidur, Inc. / 003-19710-00165
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
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August 19, 2004

Mr. David Didier
Poly Hi Solidur, Inc.
2710 American Way
Fort Wayne, Indiana 46809

Dear Mr. Didier:

Re: Exempt Construction and Operation Status,
003-19710-00165

The application from Poly Hi Solidur, Inc., received on July 14, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following, to be located at 2710 American Way in Fort Wayne, Indiana, is classified as exempt from air pollution permit requirements:

One (1) snowmobile ski manufacturing operation consisting of one (1) 1.052 MMBtu/hr natural gas fired boiler, identified as boiler # 91612 and one (1) 1.2 MMBtu/hr natural gas fired boiler, identified as boiler #THZ-0304

The following condition shall be applicable:

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

- (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 15 minutes (60 readings) in a 6-hour period 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.

This exemption is the second air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

NCB

cc: File - Allen County
Allen County Health Department
Air Compliance - Jennifer Dorn
Permit Tracking
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for New Construction
and Operation of an Exempt Source

Source Background and Description

Source Name: Poly Hi Solidur, Inc.
Source Location: 2710 American Way, Fort Wayne, Indiana 46809
County: Allen
Exemption No.: 003-19710-00165
SIC Code: 3082
Permit Reviewer: NCB

On October 29, 2002, Poly Hi Solidur, Inc. submitted an application for a snowmobile ski manufacturing operation.

The source has submitted in their application and via a phone conversation that the only source emission unit is one (1) 1.052 MMBtu/hr natural gas fired boiler, identified as boiler #91612.

On July 14, 2004, Poly Hi Solidur, Inc. submitted an application for the addition of a second source emission unit consisting of one (1) 1.2 MMBtu/hr natural gas fired boiler, identified as boiler #THZ-03/04.

The source oxides of nitrogen (NO_x) unrestricted potential to emit (UPTE) is estimated to be 1.0 tons/yr. All other regulated pollutant UPTE are determined to be negligible (<0.01 tons/yr).

This source shall therefore be approved via an exemption pursuant to 326 IAC 2-1.1-3(d)(1) which states that any new source or modification that has unrestricted potential to emit (UPTE) less than the exempt levels specified in 326 IAC 2-1.1-3(d)(1)(A) through (H), may be exempted from permitting.

Recommendation

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

Information used in this review was derived from the application and a phone call to the source made December 13, 2002. Additional information used in this review was derived from an application submitted on July 14, 2004 and a phone call to the source made August 6, 2004.

Emissions Calculations

(a) Unrestricted Potential to Emit (UPTE):

The source emissions are the natural gas criteria and hazardous air pollutant combustion emissions generated by Boiler 91612 and Boiler THZ-03/04.

(1) Criteria Pollutant Emissions:

The following calculations determine the boiler UPTE criteria pollutant emissions based on a maximum capacity of 1.052 + 1.2 MMBtu/hr = 2.252 MMBtu/hr, natural gas combustion, AP-42 emission factors, 8760 hours of operation, and emissions before controls.

$$2.252 \text{ MMBtu/hr} * 1 \text{ MMcf} / 1000 \text{ MMBtu} * 8760 \text{ hr/yr} * E_f \text{ lb/MMcf} * 1/2000 \text{ ton/lb} = \text{tons/yr}$$

	PM	PM10	SO2	NOx	VOC	CO
Ef (lb/MMcf)	1.9	7.6	0.6	100	5.5	84
tons/yr	neg.	0.1	neg.	1.0	0.1	0.8

(2) Hazardous Air Pollutant (HAP) Emissions:

The following calculations determine the flare UPTE based on a maximum capacity of 1.052 + 1.2 MMBtu/hr = 2.252 MMBtu/hr, natural gas combustion, AP-42 emission factors, 8760 hours of operation, and emissions before controls.

$$2.252 \text{ MMBtu/hr} * 1\text{MMcf} / 1000 \text{ MMBtu} * 8760 \text{ hr/yr} * \text{Ef lb/MMcf} * 1/2000 \text{ ton/lb} = \text{tons/yr}$$

HAP	Ef (lb/MMcf)	Emissions (tons/yr)
Benzene	2.1 E-3	neg.
Dichlorobenzene	1.2 E-3	neg.
Formaldehyde	7.5 E-2	neg.
Hexane	1.8	neg.
Toluene	3.4 E-3	neg.
Lead	5.0 E-4	neg.
Cadmium	1.1 E-3	neg.
Chromium	1.4 E-4	neg.
Manganese	3.8 E-4	neg.
Nickel	2.1 E-3	neg.
Total		neg.

(b) Emission After Controls:

All emissions are uncontrolled.

Total Potential Emissions

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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.”

This table reflects the source PTE before controls based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	neg.
PM-10	0.1
SO ₂	neg.
VOC	0.1
CO	0.8
NO _x	1.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	neg.
Combined HAPs	neg.

This source shall be approved via an exemption pursuant to 326 IAC 2-1.1-3(d)(1) which states that any new source or modification that has unrestricted potential to emit (UPTE) less than the exempt levels specified in 326 IAC 2-1.1-3(d)(1)(A) through (H), may be exempted from permitting.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
1-Hour Ozone	attainment or unclassifiable
8-Hour Ozone	Nonattainment
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

New Source Status

New Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	neg.	0.1	neg.	1.0	0.1	0.8	neg.	neg.

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	100	10/25

- (a) This source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This source is not a Title V major stationary source because none of the criteria pollutants exceed the applicable level of 100 tons/yr and the single and combined HAP emissions do not exceed their respective applicable levels of 10 and 25 tons per year.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):

These two boilers are not applicable to NSPS Subpart Dc, because their individual capacities are each less than 10 MMBtu/hr. Therefore, there are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) applicable to this facility.

(b) National Emission Standards for Hazardous Air Pollutants (HAP):

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that apply to the proposed source.

Subpart DDDDD - Industrial, Commercial and Institutional Boilers and Process Heaters is not applicable to this source, because the source is not a major source of HAPs.

State Rule Applicability

(a) Rules that Apply to the Entire Source:

(1) 326 IAC 1-6-3 (Preventive Maintenance Plan):

The proposed source is not required to have a preventive maintenance plan for the emission units and control devices of the source.

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

This source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.

(3) 326 IAC 2-4.1 (HAP Major Sources):

This source is not subject to the requirements of 326 IAC 2-4.1 because the single and combined HAP PTE are less than their respective applicable levels of 10 and 25 tons per year.

(4) 326 IAC 2-6 (Emission Reporting):

This source is not subject to 326 IAC 2-6 (Emission Reporting), because the source PM, SO₂, VOC, NO_x PTE do not exceed the applicable level of 100 tons per year.

(5) 326 IAC 5-1-2 (Opacity Limitations):

Opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

(b) Rules that Apply to Individual Units and Processes:

326 IAC 6-2-4 (PM Emissions From Sources of Indirect Heating):

The requirements of 326 IAC 6-2-4 do not apply because the boilers are not a source of indirect heating. The heat from the boilers are used to directly heat the transfer oil in the ski manufacturing operation.

Conclusion

This source shall be constructed and operated according to the requirements specified in Exemption 003-19710-00165.