



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: February 20, 2009

RE: The Matrixx Group / 163-19821-00170

FROM: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted 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, Suite N 501E, 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.dot12/03/07



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Mr. Rich Sevic  
The Matrixx Group  
15000 US 41 North  
Evansville, Indiana 47725

February 20, 2009

Re: 163-19821-00170  
First Significant Permit Revision to  
M163-18955-00170

Dear Mr. Sevic:

The Matrixx Group was issued Minor Source Operating Permit (MSOP), No. 163-18955-00170, on October 22, 2004, for a stationary custom plastic pellet compounding source. A letter, requesting an Administrative Review for the MSOP M163-18955-00170 and a Stay of Effectiveness for permit conditions requiring The Matrixx Group to demonstrate compliance by performing PM testing was received on November 4, 2004. The resolution of the issue of concern related to The Matrixx Group's MSOP was agreed upon June 6, 2007. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find the enclosed copy of the revised entire permit for a custom plastic pellet compounding source. This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Sandra Carr, of my staff, at 317-234-5372 or 1-800-451-6027, and ask for extension 4-5372.

Sincerely,

Iryn Callung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/sec

cc: File - Vanderburgh County  
Vanderburgh County Health Department  
Air Compliance Section

IDEM Southwest Regional Office  
Compliance Data Section  
Technical Support and Modeling  
Permits Administrative and Development  
Billing, Licensing and Training Section  
Office of Legal Counsel - April Lashbrook



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## Minor Source Operating Permit OFFICE OF AIR QUALITY

**The Matrixx Group  
15000 U.S. Highway 41 North  
Evansville, Indiana 47725**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

|   |  |
|---|--|
| Operation Permit No.: MSOP 163-18955-00170                                      |  |
| Originally Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: October 22, 2004<br><br>Expiration Date: October 22, 2009 |

|  |   |
|--|---|
| First Significant Permit Revision No.:<br>163-19821-00170  | Pages Affected: Entire Permit   |
| Issued by:<br><br>Iryn Calilung, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: February 20, 2009<br><br>Expiration Date: October 22, 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 a stationary custom plastic pellet compounding.

|                              |   |
|------------------------------|---|
| Source Address:              | 15000 U.S. Highway 41 North, Evansville, Indiana 47725  |
| Mailing Address:             | 15000 U.S. Highway 41 North, Evansville, Indiana 47725  |
| General Source Phone Number: | (812) 421-3600  |
| SIC Code:                    | 3087  |
| County Location:             | Vanderburgh   |
| Source Location Status:      | Nonattainment for PM <sub>2.5</sub> standard<br>Attainment for all other criteria pollutants  |
| Source Status:               | Minor Source Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary

---

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

- (a) Twelve (12) silos, identified as S1 through S6, R1, R2, B1, B2 W1 and W2, with a maximum capacity of 35,408 cubic feet and a maximum transfer rate of 25,000 pounds per hour, total.
- (b) Four (4) blenders, identified as BLNDR 2 through 5, constructed in 1999, capacity: 5,000 pounds per hour, each.
- (c) One (1) blender, identified as BLNDR 6, constructed in 1999, equipped with a baghouse exhausting inside, capacity: 5,000 pounds per hour.
- (d) One (1) blender, identified as BLNDR 7, constructed in 2002, capacity: 5,000 pounds per hour.
- (e) One (1) blender, identified as BLNDR 8, constructed in 2003, capacity: 8,000 pounds per hour.
- (f) One (1) blender, identified as BLNDR 9, constructed in 2001, capacity: 500 pounds per hour.
- (g) One (1) extrusion line, identified as NP1, constructed in 1999, with a capacity of 1,400 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-17
  - (3) One (1) water bath
  - (4) One (1) air blower

- (5) One (1) chopper
- (6) One (1) classifier
- (h) One (1) extrusion line, identified as NP2, constructed in 1999, with a capacity of 3,250 pounds per hour, equipped with a cartridge filter dust collector exhausting inside, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-17
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
- (i) One (1) extrusion line, identified as NP4, constructed in 2001, with a capacity of 4,000 pounds per hour, equipped with a cartridge filter dust collector exhausting inside, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-17
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
- (j) One (1) extrusion line, identified as NE1, constructed in 1999, with a capacity of 1,400 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-9
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
- (k) One (1) extrusion line, identified as NE2, constructed in 2003, with a capacity of 1,400 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-9
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier

- (l) One (1) extrusion line, identified as NE3, constructed in 2000, with a capacity of 3,000 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-9
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
  
- (m) One (1) extrusion line, identified as NX1, constructed in 1999, in the Pilot Plant, with a capacity of 330 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-19
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
  
- (n) One (1) extrusion line, identified as NX2, constructed in 1999, in the Pilot Plant, with a capacity of 40 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-19
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
  
- (o) One (1) extrusion line, identified as NX3, constructed in 1999, in the Pilot Plant, with a capacity of 25 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-19
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
  
- (p) One (1) self-contained plastic scrap grinder, identified as NE1, constructed in 1999, capacity: 300 pounds per hour.

- (q) One (1) self-contained plastic scrap grinder, identified as NE2, constructed in 2003, capacity: 300 pounds per hour.
- (r) One (1) self-contained plastic scrap grinder, identified as NE3, constructed in 1999, capacity: 500 pounds per hour.
- (s) One (1) self-contained plastic scrap grinder, identified as NP2/4, constructed in 1999, capacity: 1,000 pounds per hour.
- (t) Two (2) MIG welding stations, capacity: 2 pounds of weld wire per hour, each.
- (u) One (1) stick welding station, capacity: 12 electrodes per hour, weighing 0.09 pounds each.
- (v) One (1) TIG welding station, capacity: 0.5 pounds of weld wire per hour.
- (w) Two (2) oxy-methane flame cutting stations, maximum cutting rate: 10 inches per minute.
- (x) One (1) natural gas-fired boiler, identified as Boiler #1, constructed in 1999, exhausting to stack S-5, capacity: 1 million British thermal unit per hour.
- (y) One (1) natural gas-fired boiler, identified as Boiler #2, constructed in 1999, exhausting to stack S-6, capacity: 1 million British thermal unit per hour.
- (z) One (1) parts washer, constructed in 1999, identified as The Parts Washer, with a reservoir capacity of 30 gallons and a maximum usage rate of less than 0.1 gallons per day and 18 gallons of solvent per year.

## **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  
MC-61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

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

#### B.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  
MC-61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**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]**

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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]**

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- (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, Billing, Licensing, and Training 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 to 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]

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

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC-61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

### C.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 N. Senate Avenue  
MC-61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.

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

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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.8 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### **C.9 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

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

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

## Record Keeping and Reporting Requirements

### C.10 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

### C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (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.12 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  
MC-61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (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 quarterly or 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 reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**SECTION D.1**

**EMISSIONS UNITS OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) Twelve (12) silos, identified as S1 through S6, R1, R2, B1, B2 W1 and W2, with a maximum capacity of 35,408 cubic feet and a maximum transfer rate of 25,000 pounds per hour, total.
- (b) Four (4) blenders, identified as BLNDR 2 through 5, constructed in 1999, capacity: 5,000 pounds per hour, each.
- (c) One (1) blender, identified as BLNDR 6, constructed in 1999, equipped with a baghouse exhausting inside, capacity: 5,000 pounds per hour.
- (d) One (1) blender, identified as BLNDR 7, constructed in 2002, capacity: 5,000 pounds per hour.
- (e) One (1) blender, identified as BLNDR 8, constructed in 2003, capacity: 8,000 pounds per hour.
- (f) One (1) blender, identified as BLNDR 9, constructed in 2001, capacity: 500 pounds per hour.
- (g) One (1) extrusion line, identified as NP1, constructed in 1999, with a capacity of 1,400 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-17
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
- (h) One (1) extrusion line, identified as NP2, constructed in 1999, with a capacity of 3,250 pounds per hour, equipped with a cartridge filter dust collector exhausting inside, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-17
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
- (i) One (1) extrusion line, identified as NP4, constructed in 2001, with a capacity of 4,000 pounds per hour, equipped with a cartridge filter dust collector exhausting inside, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-17
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier

**Emissions Unit Description: (continued)**

- (j) One (1) extrusion line, identified as NE1, constructed in 1999, with a capacity of 1,400 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-9
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
  
- (k) One (1) extrusion line, identified as NE2, constructed in 2003, with a capacity of 1,400 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-9
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
  
- (l) One (1) extrusion line, identified as NE3, constructed in 2000, with a capacity of 3,000 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-9
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
  
- (m) One (1) extrusion line, identified as NX1, constructed in 1999, in the Pilot Plant, with a capacity of 330 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-19
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
  
- (n) One (1) extrusion line, identified as NX2, constructed in 1999, in the Pilot Plant, with a capacity of 40 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-19
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier

**Emissions Unit Description: (continued)**

- (o) One (1) extrusion line, identified as NX3, constructed in 1999, in the Pilot Plant, with a capacity of 25 pounds per hour, consisting of:
  - (1) One (1) feed hopper
  - (2) One (1) extruder, exhausting to stack S-19
  - (3) One (1) water bath
  - (4) One (1) air blower
  - (5) One (1) chopper
  - (6) One (1) classifier
- (p) One (1) self-contained plastic scrap grinder, identified as NE1, constructed in 1999, capacity: 300 pounds per hour.
- (q) One (1) self-contained plastic scrap grinder, identified as NE2, constructed in 2003, capacity: 300 pounds per hour.
- (r) One (1) self-contained plastic scrap grinder, identified as NE3, constructed in 1999, capacity: 500 pounds per hour.
- (s) One (1) self-contained plastic scrap grinder, identified as NP2/4, constructed in 1999, capacity: 1,000 pounds per hour.
- (t) Two (2) MIG welding stations, capacity: 2 pounds of weld wire per hour, each.
- (u) One (1) stick welding station, capacity: 12 electrodes per hour, weighing 0.09 pounds each.
- (v) One (1) TIG welding station, capacity: 0.5 pounds of weld wire per hour.
- (w) Two (2) oxy methane flame cutting stations, maximum cutting rate: 10 inches per minute.

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

**Emission Limitations and Standards**

**D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]**

- (a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the eight (8) blenders shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the nine (9) extrusion lines shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.
- (c) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the four (4) plastic scrap grinders shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

- (d) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the four (4) welding stations and two (2) flame cutting stations shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

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

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

### Compliance Determination Requirements

#### D.1.3 Particulate Control

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In order to comply with Condition D.1.1, the baghouse for particulate control shall be in operation and control emissions from the blender, identified as BLNDR 6, at all times that the blender is in operation.

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

#### D.1.4 Broken or Failed Bag Detection

---

In the event that dust collector/baghouse failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from the blending operations, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### D.1.5 Parametric Monitoring

---

- (a) The Permittee shall record the pressure drop across the baghouse, used in conjunction with blender #6 (BLNDR6), at least once per week when blender #6 is in operation.
- (b) When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.8 to 3.2 inches of water or a range recommended by the manufacturer, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that are outside the above mentioned ranges is not a deviation from this permit, however failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (c) The instruments used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every twelve (12) months.

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

### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.5, the Permittee shall maintain daily records of the pressure drop across the baghouse controlling emissions from blender #6 (BLNDR6). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g., blender #6 did not operate that day).
- (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

### Emissions Unit Description:

- (x) One (1) natural gas-fired boiler, identified as Boiler #1, constructed in 1999, exhausting to stack S-5, capacity: 1 million British thermal unit per hour.
- (y) One (1) natural gas-fired boiler, identified as Boiler #2, constructed in 1999, exhausting to stack S-6, capacity: 1 million British thermal unit per hour.

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

### Emission Limitations and Standards

#### D.2.1 Particulate [326 IAC 6-1-2]

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Pursuant to 326 6-1-2(b), County Specific Particulate Matter Limitations, the particulate matter (PM) emissions from each of the two (2) 1.00 million British thermal units per hour heat input boilers, identified as Boiler #1 & Boiler #2, shall be limited to one-hundredth (0.01) grain per dry standard cubic foot (dscf) of exhaust air.

### SECTION D.3

### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (z) One (1) parts washer, constructed in 1999, identified as The Parts Washer, with a reservoir capacity of 30 gallons and a maximum usage rate of less than 0.1 gallons per day and 18 gallons of solvent per year.

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

#### Emission Limitations and Standards

##### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: The Matrixx Group  
Source Address: 15000 U.S. Highway 41 North, Evansville, Indiana 47725  
Mailing Address: 15000 U.S. Highway 41 North, Evansville, Indiana 47725  
MSOP No.: M163-18955-00170

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
ANNUAL NOTIFICATION**

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

|                      |                             |
|----------------------|-----------------------------|
| <b>Company Name:</b> | The Matrixx Group           |
| <b>Address:</b>      | 15000 U.S. Highway 41 North |
| <b>City:</b>         | Evansville, Indiana 47725   |
| <b>Phone #:</b>      | (812) 421-3600              |
| <b>MSOP #:</b>       | M163-18955-00170            |

I hereby certify that The Matrixx Group is :

still in operation.

no longer in operation.

I hereby certify that The Matrixx Group is :

in compliance with the requirements of MSOP M163-18955-00170.

not in compliance with the requirements of MSOP M163-18955-00170.

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

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.

|                       |
|-----------------------|
| <b>Noncompliance:</b> |
|                       |
|                       |
|                       |

# MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER: (317) 233-6865**

**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 ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

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: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ 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 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:

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## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit (MSOP)

#### Source Description and Location

|   |  |
|---|--|
| <b>Source Name:</b>                     | <b>The Matrixx Group</b>                       |
| <b>Source Location:</b>                 | <b>15000 US 41 North, Evansville, IN 47725</b> |
| <b>County:</b>                          | <b>Vanderburgh</b>                             |
| <b>SIC Code:</b>                        | <b>3087</b>                                    |
| <b>Operation Permit No.:</b>            | <b>M163-18955-00170</b>                        |
| <b>Operation Permit Issuance Date:</b>  | <b>October 22, 2004</b>                        |
| <b>Significant Permit Revision No.:</b> | <b>163-19821-00170</b>                         |
| <b>Permit Reviewer:</b>                 | <b>Sandra Carr</b>                             |

On November 4, 2004, the Office of Air Quality (OAQ) received an application from The Matrixx Group related to a revision of an MSOP for an existing stationary custom plastic pellet compounding source.

#### Existing Approvals

This source was issued a MSOP (M163-18955-00170) on October 22, 2004.

#### County Attainment Status

This source is located in Vanderburgh County.

| Pollutant        | Designation   |
|------------------|---|
| SO <sub>2</sub>  | Better than national standards.   |
| CO               | Unclassifiable or attainment effective November 15, 1990.   |
| O <sub>3</sub>   | Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. <sup>1</sup> |
| PM <sub>10</sub> | Unclassifiable effective November 15, 1990.   |
| NO <sub>2</sub>  | Cannot be classified or better than national standards.   |
| Pb               | Not designated.   |

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour designation was revoked effective June 15, 2005.

Basic nonattainment designation effective federally April 5, 2005, for PM<sub>2.5</sub>.

*(Air Pollution Control Board; 326 IAC 1-4-83; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)*

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM<sub>2.5</sub> promulgated on May 8<sup>th</sup>, 2008, and effective on July 15<sup>th</sup> 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for NO<sub>x</sub>, SO<sub>2</sub>, VOC, CO, and PM<sub>10</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **History**

On November 4, 2004, The Matrix Group filed a petition for Administrative Review for the MSOP 163-18955-00170 and request for a Stay of Effectiveness for permit conditions requiring The Matrix Group to demonstrate compliance by performing stack testing on the baghouse connected to blender (BLNDR6).

Resolution of the issue of concern related to The Matrix Group's MSOP was agreed upon by The Matrixx Group and IDEM on June 6, 2007. The testing requirement in Condition D.1.2 will not be required as long as the opacity from the blender (BLNDR6) vent is at 0.0%. Upon further evaluation, IDEM agreed to remove PM testing for the blenders because Matrixx provided additional information that there were no visible emissions. However, IDEM has added compliance monitoring for the baghouse on the blender identified as BLNDR6.

#### **Description of Proposed Revision**

The MSOP is being revised through a Significant Permit Revision. This revision, which includes deleting the PM stack testing condition and adding compliance monitoring for the blender (BLNDR6), is being performed pursuant to 326 IAC 2-6-1.-6(i)(1), because it reduces the frequency of a monitoring condition.

#### **Enforcement Issues**

There are no pending enforcement actions related to this revision.

#### **Emission Calculations**

There are no emission calculations included for the permit revision to this source.

### **PTE of the Entire Source After Issuance of the MSOP Revision**

The revision of MSOP No. 163-18955-00170 will not change the source's potential to emit (PTE).

#### **MSOP Status**

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

### **Federal Rule Applicability Determination**

There are no new federal rules included for the permit revision to this source.

### **State Rule Applicability Determination**

There are no new state rules included for the permit revision to this source.

### **Compliance Determination, Monitoring and Testing Requirements**

There are no additional testing or monitoring requirements related to this revision.

### **Proposed Changes**

The following are the proposed changes due to the resolution of the appeal:

- (a) Condition D.1.2 has been deleted:

~~D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]~~

~~Within 180 days after issuance of this MSOP, in order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform PM testing for the one (1) blender exhausting to the baghouse (BLNDR 6) and at least one (1) of the seven (7) uncontrolled blenders (BLNDR 2, 3, 4, 5, 7, 8 or 9) utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.~~

- (b) A requirement for a Preventive Maintenance Plan for the baghouses used for particulate control is added as Condition D.1.2.

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

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

- (c) To assure compliance with Condition D.1.1, conditions requiring compliance monitoring and record keeping have been added (D.1.4 - D.1.6) and the following sentence has been deleted:

~~There are no specific compliance monitoring requirements for these facilities.~~

**D.1.4 Broken or Failed Bag Detection**

**In the event that dust collector/baghouse failure has been observed:**

- (a) **For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.**

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from the blending operations, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### **D.1.5 Parametric Monitoring**

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- (a) The Permittee shall record the pressure drop across the baghouse, used in conjunction with blender #6 (BLNDR6), at least once per week when blender #6 is in operation.
- (b) When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.8 to 3.2 inches of water or a range recommended by the manufacturer, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that are outside the above mentioned ranges is not a deviation from this permit, however failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (c) The instruments used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every twelve (12) months.

#### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.5, the Permittee shall maintain daily records of the pressure drop across the baghouse controlling emissions from blender #6 (BLNDR6). The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g., blender #6 did not operate that day).
  - (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (d) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:
- (1) IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual in the permit document. Section A.1 is updated as follows:

Authorized Individual: \_\_\_\_\_ ~~Executive Vice President of Administration~~

- (2) All occurrences of IDEM's mailing addresses have been updated in the permit. Any occurrences of P.O. Box 6015 in the permit have been removed, any occurrences of the zip code "46204" or 46206-6015 have been revised to **46204-2251**, and all addresses have been revised to include a mail code (MC) as follows:

|                    |                           |
|--------------------|---------------------------|
| Asbestos Section:  | <b>MC 61-52 IGCN 1003</b> |
| Compliance Branch: | <b>MC 61-53 IGCN 1003</b> |
| Permits Branch:    | <b>MC 61-53 IGCN 1003</b> |

- (3) A form for source Certification has been added to this permit.

#### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 4, 2004.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Revision No. 163-19821-00170. The staff recommends to the Commissioner that this MSOP Significant Revision be approved.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Sandra Carr at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5372) or toll free at 1-800-451-6027 extension (45372).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)