



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: March 09, 2006
RE: Owens-Illinois Closure, Inc. / 081-22504-00055
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 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Mr. Mike Kelly
Owens-Illinois Closure, Inc.
1900 Musicland Drive
Franklin, IN 46131

March 09, 2006

Dear Mr. Kelly:

Re: Exempt Construction and Operation Status,
081-22504-00055

The application from Owens-Illinois Closure, Inc., received on January 12, 2006, 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 plastic injection molding operations and assembly of the injected parts into finished ware, to be located at 1900 Musicland Drive, Franklin, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) Ink Jet Printer, identified as Ink Jet Printer, with a maximum capacity of 100 pieces per minute, exhausting inside the building.
- (b) One (1) Naptha Coating Applicator, identified as Coating Applicator, with a maximum capacity of 100 parts per minute, exhausting inside the building.
- (c) One (1) Silk Screen Printer, identified as Silk Screen Printer, exhausting inside the building.
- (d) Two (2) Natural Gas Boilers, identified as Boiler 1 and 2, with a capacity of 2.4 MMBtu per hour each, exhausting to the atmosphere.
- (e) One (1) Burn-Off Oven, identified as Burn-Off Oven, exhausting to the atmosphere.

The following conditions shall be applicable:

- (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:
 - (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.

- (2) Pursuant to 326 IAC 6-2-4(a) particulate emissions from indirect heating constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where

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

Pt = emission rate limit (lbs/MMBtu)

Therefore, particulate emissions from the two (2) 2.4 MMBtu/hr boilers shall not exceed 0.6 lb/MMBtu heat input.

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
Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

JF

cc: File - Johnson County
Johnson County Health Department
Air Compliance – Vaughn Ison
Permit Tracking
Compliance Data Section

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Owens-Illinois Closure, Inc.
Source Location:	1900 Musicland Drive, Franklin, Indiana, 46131
County:	Johnson
SIC Code:	3089
Exemption No.:	081-22504-00055
Permit Reviewer:	James Farrell

The Office of Air Quality (OAQ) has reviewed an application from Owens-Illinois Closure, Inc. relating to the operation of a plastic injection molding operations and assembly of the injected parts into finished ware facility.

History

Owens-Illinois Closure, Inc. was issued an Exempt Construction and Operating Status (081-18520-00055) on March 16, 2004. On January 12, 2006, the Office of Air Quality (OAQ) received an application to add one (1) Burn-Off Oven.

Existing Emission Units and Pollution Control Equipment

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

- (a) One (1) Ink Jet Printer, identified as Ink Jet Printer, with a maximum capacity of 100 pieces per minute, exhausting inside the building.
- (b) One (1) Naptha Coating Applicator, identified as Coating Applicator, with a maximum capacity of 100 parts per minute, exhausting inside the building.
- (c) One (1) Silk Screen Printer, identified as Silk Screen Printer, exhausting inside the building.
- (d) Two (2) Natural Gas Boilers, identified as Boiler 1 and 2, with a capacity of 2.4 MMBtu per hour each, exhausting to the atmosphere.

New Emission Units and Pollution Control Equipment

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

- (e) One (1) Burn-Off oven, identified as Burn-Off Oven, exhausting to the atmosphere.

Existing Approvals

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

- (a) Exemption 081-18520-00055 issued on March 16, 2004.

All conditions from previous approvals were incorporated in this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on January 12, 2006, with additional information received on February 13, 2006.

Emission Calculations

See Appendix A, pages 1-3 of this document for detailed emission calculations

Potential to Emit of the Source Before Controls including New Emission Unit

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/yr)
PM	0.2
PM-10	0.2
SO ₂	0.1
VOC	0.2
CO	2.0
NO _x	2.2

HAPs	Potential to Emit (tons/yr)
Single HAP	negligible
Combined HAP's	negligible

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Johnson County.

Pollutant	Status Status
PM-10	Attainment
PM-2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (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 ozone. Johnson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Johnson County has been classified as unclassifiable or attainment for PM-2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM-2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM-2.5 emissions, it has directed states to regulate PM-10 emissions as surrogate for PM-2.5 emissions. See the State Rule Applicability for the source section.
- (c) Johnson County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM-10	0.2
PM-2.5	0.2
SO ₂	0.1
VOC	0.2
CO	2.0
NO _x	2.2
Single HAP	negligible
Combination HAP's	negligible

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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 per year.

This is the second air approval issued to this source.

Federal Rule Applicability

- (a) The two (2) Boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40c, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units due to the capacities are less than 10 MMBtu per hour. Therefore, this NSPS is not included in this exemption.
- (b) The Printers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.43, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing due to the printers are not publication rotogravure printing presses. Therefore, this NSPS is not included in this exemption.
- (c) The Bake-Off Oven is not subject to the requirements of the of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.50, Subpart E - Standards of Performance for Incinerators due to the Bake-Off Oven does not incinerate at a charge rate of 50 tons per day or greater. Therefore, this NSPS is not included in this exemption.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJJJ – Paper and Other Web Coating due to the printers and coating operations are not part of or located at a major source of HAP's. Therefore, this NESHAP is not included in this exemption.
- (e) The two (2) Boilers and the burn off oven are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart DDDDD - Standards for Industrial, Commercial and Institutional Boilers and Process Heaters, because they are not part of or located at a major source for HAP's. Therefore, this NESHAP is not included in this exemption.

- (f) The Printers are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart KK – Printing and Publishing due to the printers are not publication rotogravure, product and packaging rotogravure or wide web flexographic printing presses. Therefore, this NESHAP is not included in this exemption.
- (g) The Printers and Bake-Off Oven are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart OOOO – Fabric Printing, Coating & Dyeing due to the printing does not involve the printing or coating of fabrics or other textiles. Therefore, this NESHAP is not included in this exemption.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential emissions of each of the criteria pollutants are less than 250 tons per year and the source is not in one of the 28 listed source categories. Therefore, 326 IAC 2-2 Prevention of Significant Deterioration (PSD) does not apply.

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

The potential emissions of Hazardous Air Pollutants (HAP) are less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not required to have on operating permit under 326 IAC 2-7, does not emit lead into the ambient air at levels ≥ 5 tpy, and is located in Johnson County. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))

Pursuant to 326 IAC 6-2-4(a) particulate emissions from indirect heating constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where

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

Pt = emission rate limit (lbs/MMBtu)

Therefore, particulate emissions from the two (2) 2.4 MMBtu/hr boilers shall not exceed 0.6 lb/MMBtu heat input because the total source maximum operating capacity heat input for indirect heating is less than 10 MMBtu/hr.

326 IAC 4-2 (Incinerators)

This rule is not applicable to the Burn-Off Oven because it is not an incinerator and is considered part of a coating line pursuant to 326 IAC 1-2-14. Therefore, the requirements of 326 IAC 4-2 do not apply to the Burn-Off Oven.

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))

This rule is not applicable to the Burn-Off Oven because it is not a source of indirect heating. Therefore, the requirements of 326 IAC 6-2-4 does not apply to the Burn-Off Oven.

326 IAC 6-3-1 (Particulate Emissions Limitations for Manufacturing Processes)

The two (2) Boilers are exempt from the requirements of 6-3-1 pursuant to 6-3-1(b)(1), because it uses combustion for indirect heating. Therefore, the two (2) Boilers are exempt from the requirements of 326 IAC 6-3. Therefore, the requirements of 326 IAC 6-3-2 do not apply.

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)

The emission units at this source have negligible Particulate emissions. Therefore, the requirements of 326 IAC 6-3-2 do not apply.

326 IAC 8-1-6 (VOC Rules: New facilities; General Reduction Requirements)

The potential VOC emissions from the emission units at this source are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-2-5 (Paper Coating Operations) March 16, 2004

Pursuant to 326 IAC 8-2-1(2), the silk screen and ink jet printers were constructed after January 1, 1980 and have potential emissions of less than 25 tons per year of VOC. Therefore, the requirements of 326 IAC 8-2-5 do not apply.

326 IAC 8-5-5 (Graphic Arts Operations)

The silk screen and ink jet printers are not packaging or publication rotogravure or wide web flexographic printing presses. Therefore, the requirements of 326 IAC 8-5-5 do not apply.

Conclusion

The operation of this plastic injection molding operations and assembly of the injected parts into finished ware facility shall be subject to the conditions of the attached Exemption 081-22504-00055.

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

Company Name: Owens-Illinois Closure, Inc.
Address City IN Zip: 1900 Musicland Drive, Franklin, Indiana 46131
Permit Number: 22504
Plt ID: 081-00055
Reviewer: James Farrell
Date: 22-Feb-06

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.8

42.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0	0.2	0.0	2.1	0.1	1.8

*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

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See page 2 for HAPs emissions calculations.

updated 4/99

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

Company Name: Owens-Illinois Closure, Inc.
Address City IN Zip: 1900 Musicland Drive, Franklin, Indiana 46131
Permit Number: 22504
Plt ID: 081-00055
Reviewer: James Farrell
Date: 22-Feb-06

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	4.415E-05	2.523E-05	1.577E-03	3.784E-02	7.148E-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	1.051E-05	2.313E-05	2.943E-05	7.989E-06	4.415E-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.

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

Company Name: Owens-Illinois Closure, Inc.
Address City IN Zip: 1900 Musicland Drive, Franklin, Indiana 46131
Permit Number: 22504
Plt ID: 081-00055
Reviewer: James Farrell
Date: 22-Feb-06

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.8

42.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0	0.2	0.0	2.1	0.1	1.8

*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

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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

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See page 2 for HAPs emissions calculations.

updated 4/99

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

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Address City IN Zip: 1900 Musicland Drive, Franklin, Indiana 46131
Permit Number: 22504
Plt ID: 081-00055
Reviewer: James Farrell
Date: 22-Feb-06

	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	4.415E-05	2.523E-05	1.577E-03	3.784E-02	7.148E-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	1.051E-05	2.313E-05	2.943E-05	7.989E-06	4.415E-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.