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Mr. Mike Krause
American Renolit Corporation
1207 East Lincolnway
LaPorte, Indiana 46350

March 30, 2006

Re: 091-22656-00127
2nd Notice-Only Change to
MSOP 091-17752-00127

Dear Mr. Krause:

American Renolit Corporation was issued a permit on November 3, 2003, for a stationary flexible plastic film manufacturing plant. A letter notifying the Office of Air Quality of the intent to modify the source by adding emissions units and related equipment was received on February 10, 2006. The Permittee proposes to add the following equipment.

- One (1) PVC plastic film calender (identified as calender 4), to be constructed in 2006, with a maximum throughput rate of 2000 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL4-1.
- Two (2) liquid scale areas, identified as W9 and W10.
- Two (2) dry scales, identified as W11 and W12, with a combined maximum capacity of 4,400 pounds per hour. Emissions from scales and bag stations are controlled by one (1) dust collector, which exhausts at stack PVC MIX-5.
- Nine (9) storage silos, with a pneumatic conveying system capable of handling 4,400 pounds of PVC per hour, consisting of the following:
 - Three (3) PVC resin silos, identified as Silos 17, 18, and 19, each with a capacity of 5,540 cubic feet.
 - Two (2) Interior big bag silos, identified as Silos 20 and 23, each with a capacity of 88 cubic feet.
 - Four (4) Interior bag silos, identified as Silos 21, 22, 24, and 25, each with a capacity of 17 cubic feet.
- Twelve Storage Tanks, consisting of the following:
 - Four (4) liquid tanks, identified as T50, T51, T52 and T53, each with a maximum storage capacity of 5,100 gallons.
 - Six (6) liquid tanks, identified as T55, T56, T57, T58, T59, and T60, each with a maximum storage capacity of 610 gallons.
 - Two (2) heated tanks, identified as HT3 and HT4, each with a maximum storage capacity of 54 gallons.
- Two (2) cooling towers.

Pursuant to 326 IAC 2-6.1-6(d)(10) and 326 IAC 2-6.1-6(d)(13), the addition of these emissions units qualifies as a Notice-Only Change because the increase in potential to emit of PM, PM10, VOC and HAPs due to this change is less than the levels requiring a minor permit revision in 326 IAC 2-6.1-6(g). See Appendix A, pages 1 through 3 for emissions calculations.

Pursuant to 326 IAC 2-1.1-11, the Permittee shall perform stack testing for volatile organic

compounds on one of the PVC plastic film calenders (calenders 1 through calender 4) to verify compliance with the MSOP requirements (326 IAC 2-6.1).

Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
- (1) One (1) PVC plastic film calender (identified as calender 1), constructed in 1999, with a maximum throughput rate of 1,600 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 1-1.
 - (2) One (1) PVC plastic film calender (identified as calender 2), constructed in 2001, with a maximum throughput rate of 925 pounds of raw material per hour, and consisting of a PVC mixing area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 2-1.
 - (3) One (1) PVC plastic film calender (identified as calender 3), constructed in 2003, with a maximum throughput rate of 1,800 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted through stack CAL 3-1.
 - (4) **One (1) PVC plastic film calender (identified as calender 4), constructed in 2006, with a maximum throughput rate of 2,000 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL4-1.**
 - (45) **Eight (8) Six (6) liquid scale areas (identified as W2, W3, W4, W5, W7, and W8, W9 and W10).**
 - (56) Two (2) weigh scale and mixing areas (identified as W1 and W6) consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks (identified as Tanks 91 and 92). Each weigh scale area handles a maximum of 13,200 pounds per hour. Emissions are controlled by two (2) dust collectors, which exhausts at stacks PVC MIX-2 and PVC MIX-4.
 - (7) **Two (2) dry scales, identified as W11 and W12, with a combined maximum capacity of 4,400 pounds per hour. Emissions from scales and bag stations are controlled by one (1) dust collector, which exhausts at stack PVC MIX-5.**
 - (68) PVC storage and handling systems including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and eight (8) storage silos (identified as Silos 1 through 8).
 - (9) **Nine (9) storage silos, with a pneumatic conveying system capable of handling 4,400 pounds of PVC per hour, consisting of the following:**
 - (A) **Three (3) PVC resin silos, identified as Silos 17, 18, and 19, each**

with a capacity of 5,540 cubic feet.

- (B) Two (2) Interior big bag silos, identified as Silos 20 and 23, each with a capacity of 88 cubic feet.**
- (C) Four (4) Interior bag silos, identified as Silos 21, 22, 24, and 25, each with a capacity of 17 cubic feet.**

(710) Thirty-one (31) ~~Nineteen (19)~~ storage tanks, comprising:

- (A) Ten (10) storage tanks (identified as T-31 through T-34, T-38, and T-40 through T-44), each having a maximum storage capacity of 65 gallons.**
- (B) Four (4) storage tanks (identified as T-45 through T48), each having a maximum storage capacity of 8,086 gallons.**
- (C) Two (2) holding tanks (identified as HT-1 and HT-2), each having a maximum storage capacity of 52.8 gallons.**
- (D) Three (3) storage tanks (identified as T-35, T-36, and T-37), each having a maximum capacity of 85 gallons.**
- (E) Four (4) liquid tanks, identified as T50, T51, T52 and T53, each with a maximum storage capacity of 5,100 gallons.**
- (F) Six (6) liquid tanks, identified as T55, T56, T57, T58, T59, and T60, each with a maximum storage capacity of 610 gallons.**
- (G) Two (2) heated tanks, identified as HT3 and HT4, each with a maximum storage capacity of 54 gallons.**

(811) Six (6) ~~Four (4)~~ cooling towers.

(912) Two (2) natural gas fired oil heaters (identified as OH-1 and OH-2), each with a maximum heat input of 3.4 MMBtu per hour.

...

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description:

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:**
 - (1) One (1) PVC plastic film calender (identified as calender 1), constructed in 1999, with a maximum throughput rate of 1600 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 1-1.**
 - (2) One (1) PVC plastic film calender (identified as calender 2), constructed in 2001, with a maximum throughput rate of 925 pounds of raw material per hour, and consisting of a PVC mixing area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 2-1.**
 - (3) One (1) PVC plastic film calender (identified as calender 3), constructed in 2003, with a**

maximum throughput rate of 1,800 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted through stack CAL 3-1.

(4) One (1) PVC plastic film calender (identified as calender 4), constructed in 2006, with a maximum throughput rate of 2,000 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL4-1.

(56) Two (2) weigh scale and mixing areas (identified as W1 and W6) consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks (identified as Tanks 91 and 92). Each weigh scale area handles a maximum of 13,200 pounds per hour. Emissions are controlled by two (2) dust collectors, which exhausts at stacks PVC MIX-2 and PVC MIX-4.

(7) Two (2) dry scales, identified as W11 and W12, with a combined maximum capacity of 4,400 pounds per hour. Emissions from scales and bag stations are controlled by one (1) dust collector, which exhausts at stack PVC MIX-5.

(68) PVC storage and handling systems including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and eight (8) storage silos (identified as Silos 1 through 8).

(9) Nine (9) storage silos, with a pneumatic conveying system capable of handling 4,400 pounds of PVC per hour, consisting of the following:

(A) Three (3) PVC resin silos, identified as Silos 17, 18, and 19, each with a capacity of 5,540 cubic feet.

(B) Two (2) Interior big bag silos, identified as Silos 20 and 23, each with a capacity of 88 cubic feet.

(C) Four (4) Interior bag silos, identified as Silos 21, 22, 24, and 25, each with a capacity of 17 cubic feet.

(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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PVC film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
Calender Line 1	1,600	0.80	3.53
Calender Line 2	925	0.46	2.45
Calender Line 3	1,800	0.90	3.82
Calender Line 4	2,000	1.00	4.10

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
Each of the Two (2) Weigh Scale and Mixing Areas (W1 and W6)	13,200	6.60	14.5
Dry scale (W11 and W12)	4,400	2.20	6.95
PVC Handling (Silos 1 – 8)	13,200	6.60	14.5
PVC Handling (Silos 17 – 25)	4,400	2.20	6.95

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Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 3 and 12 months after issuance of Notice Only Change 091-22656-00127 to MSOP 091-17752-00127, in order to demonstrate compliance with 326 IAC 2-6.1, the Permittee shall perform VOC testing for one of the PVC plastic film calenders (calender 1 through calender 4) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.3.4 Particulate Control

D.1.45 Visible Emissions Notations

(a) Visible emission notations of the weigh scale and mixing areas (identified as W1, ~~and W6,~~ **W11, and W12**) and PVC handling stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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D.1.56 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse/dust collector used in conjunction with the weigh scale and mixing areas (identified as W1, ~~and W6,~~ **W11, and W12**) and PVC handling, at least once per shift when the weigh scale and mixing areas (identified as W1, ~~and W6,~~ **W11, and W12**) and PVC handling are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse/dust collectors is outside the normal range of 1.5 and 7.5 inches of water for ~~W1 and W6~~ or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

...

D.1.67 Baghouse/Dust Collector Inspections

An inspection shall be performed each calendar quarter of all bags controlling the weigh scale and mixing areas (identified as W1, ~~and W6,~~ **W11, and W12**) and PVC handling. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.78 Broken or Failed Bag/Dust Collector Detection

D.1.89 Record Keeping Requirements

- (a) To document compliance with Condition D.1.45, the Permittee shall maintain records of visible emission notations of the weigh scale and mixing areas (identified as W1, ~~and~~ W6, **W11, and W12**) and PVC handling stack exhaust once per shift.
- (b) To document compliance with Condition D.1.56, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.
- (c) To document compliance with Condition D.1.67, the Permittee shall maintain records of the results of the inspections required under Condition D.1.67.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description:

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
 - (45) **Eight (8)** Six ~~(6)~~ liquid scale areas (identified as W2, W3, W4, W5, W7, ~~and~~ W8, **W9 and W10**).
 - (710) **Thirty-one (31)** Nineteen ~~(19)~~ storage tanks, comprising:
 - (A) Ten (10) storage tanks (identified as T-31 through T-34, T-38, and T-40 through T-44), each having a maximum storage capacity of 65 gallons.
 - (B) Four (4) storage tanks (identified as T-45 through T48), each having a maximum storage capacity of 8,086 gallons.
 - (C) Two (2) holding tanks (identified as HT-1 and HT-2), each having a maximum storage capacity of 52.8 gallons.
 - (D) Three (3) storage tanks (identified as T-35, T-36, and T-37), each having a maximum capacity of 85 gallons.
 - (E) **Four (4) liquid tanks, identified as T50, T51, T52 and T53, each with a maximum storage capacity of 5,100 gallons.**
 - (F) **Six (6) liquid tanks, identified as T55, T56, T57, T58, T59, and T60, each with a maximum storage capacity of 610 gallons.**
 - (G) **Two (2) heated tanks, identified as HT3 and HT4, each with a maximum storage capacity of 54 gallons.**
 - (811) **Six (6)** Four ~~(4)~~ cooling towers.
 - (912) Two (2) natural gas fired oil heaters (identified as OH-1 and OH-2), each with a maximum heat input of 3.4 MMBtu per hour.
- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
 - (5) Two (2) cooling towers.

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

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mr. Stephen Treimel, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Mr. Treimel. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

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

Attachments
ERG/ST

cc: File - LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Letty Zepeda
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



Mitchell E. Daniels, Jr.
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Thomas W. Easterly
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Indianapolis, Indiana 46204-2251
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NEW SOURCE CONSTRUCTION PERMIT AND MINOR SOURCE OPERATING PERMIT (MSOP)

OFFICE OF AIR QUALITY

**American Renolit Corporation
1207 East Lincolnway
LaPorte, Indiana 46350**

(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.

Operation Permit No.: MSOP 091-17752-00127	
Issued by:	Issuance Date: November 3, 2003
Paul Dubenetzky, Branch Chief Office of Air Quality	Expiration Date: November 3, 2008

First Notice Only Change No. 091-22474-00127, issued February 24, 2006

Second Notice Only Change No.: 091-22656-00127	Affected Pages: 4, 5, 17-20
Original signed by:	Issuance Date: March 30, 2006
Nysa L. James, Section Chief Permits Branch	Expiration Date: November 3, 2008

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6,1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
SECTION B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Effective Date of the Permit [IC13-15-5-3]	
B.4	Renovation of Permits [326 IAC 2-1.1-9(5)]	
B.5	Permit Term and Renewal [326 IAC 2-6-1-7(a)][326 IAC 2-1.1-9.5]	
B.6	Modification to Permit [326 IAC 2]	
B.7	Minor Source Operating Permit [326 IAC 2-6.1]	
B.8	Phase Construction Time Frame	
B.9	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11	Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]	
B.12	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][IC 13-30-3-1]	
B.13	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.14	Annual Fee Payment [326 IAC 2-1.1-7]	
SECTION C	SOURCE OPERATION CONDITIONS	11
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]	
C.2	Permit Renovation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.6	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.7	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.8	Compliance Monitoring [326 IAC 2-1.1-11]	
C.9	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
C.10	Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]	
C.11	Compliance Response Plan - Preparation and Implementation	
	Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	
C.12	Malfunctions Report [326 IAC 1-6-2]	
C.13	General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]	
C.14	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
SECTION D.1	FACILITY OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.1.1	Particulate [326 IAC 6-3-2]	

TABLE OF CONTENTS (Continued)

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

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

D.1.4 Particulate Control

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

D.1.5 Visible Emissions Notations

D.1.6 Parametric Monitoring

D.1.7 Baghouse/Dust Collector Inspections

D.1.8 Broken or Failed Bag/Dust Collector Detection

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS..... 20

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-3-2]

D.2.2 Particulate Control

SECTION D.3 FACILITY OPERATION CONDITIONS..... 23

Emission Limitations and Standards

D.3.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

D.3.2 VOC [326 IAC 12-1][40 CFR Part 60, Subpart FFF]

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]

D.3.4 Volatile Organic Compounds (VOC)

D.3.5 Preventive Maintenance Plan [326 IAC 1-6-3]

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

D.3.6 Record Keeping Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS..... 24

Emission Limitations and Standards

Annual Notification 25

Malfunction Report 26

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 2-8-3(b)]

The Permittee owns and operates a stationary flexible plastic film manufacturing plant.

Authorized Individual:	Director of Manufacturing Operations
Source Address:	1207 East Lincolnway, LaPorte, Indiana 46350
Mailing Address:	1207 East Lincolnway, LaPorte, Indiana 46350
General Source Phone:	(219) 324-6886
SIC Code:	3081
County:	LaPorte
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit (MSOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
- (1) One (1) PVC plastic film calender (identified as calender 1), constructed in 1999, with a maximum throughput rate of 1,600 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 1-1.
 - (2) One (1) PVC plastic film calender (identified as calender 2), constructed in 2001, with a maximum throughput rate of 925 pounds of raw material per hour, and consisting of a PVC mixing area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 2-1.
 - (3) One (1) PVC plastic film calender (identified as calender 3), constructed in 2003, with a maximum throughput rate of 1,800 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted through stack CAL 3-1.
 - (4) One (1) PVC plastic film calender (identified as calender 4), constructed in 2006, with a maximum throughput rate of 2,000 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL4-1.
 - (5) Eight (8) liquid scale areas (identified as W2, W3, W4, W5, W7, W8, W9 and W10).
 - (6) Two (2) weigh scale and mixing areas (identified as W1 and W6) consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks (identified as Tanks 91 and 92). Each weigh scale area handles a maximum of 13,200

pounds per hour. Emissions are controlled by two (2) dust collectors, which exhausts at stacks PVC MIX-2 and PVC MIX-4.

- (7) Two (2) dry scales, identified as W11 and W12, with a combined maximum capacity of 4,400 pounds per hour. Emissions from scales and bag stations are controlled by one (1) dust collector, which exhausts at stack PVC MIX-5.
 - (8) PVC storage and handling systems including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and eight (8) storage silos (identified as Silos 1 through 8).
 - (9) Nine (9) storage silos, with a pneumatic conveying system capable of handling 4,400 pounds of PVC per hour, consisting of the following:
 - (A) Three (3) PVC resin silos, identified as Silos 17, 18, and 19, each with a capacity of 5,540 cubic feet.
 - (B) Two (2) Interior big bag silos, identified as Silos 20 and 23, each with a capacity of 88 cubic feet.
 - (C) Four (4) Interior bag silos, identified as Silos 21, 22, 24, and 25, each with a capacity of 17 cubic feet.
 - (10) Thirty-one (31) storage tanks, comprising:
 - (A) Ten (10) storage tanks (identified as T-31 through T-34, T-38, and T-40 through T-44), each having a maximum storage capacity of 65 gallons.
 - (B) Four (4) storage tanks (identified as T-45 through T48), each having a maximum storage capacity of 8,086 gallons.
 - (C) Two (2) holding tanks (identified as HT-1 and HT-2), each having a maximum storage capacity of 52.8 gallons.
 - (D) Three (3) storage tanks (identified as T-35, T-36, and T-37), each having a maximum capacity of 85 gallons.
 - (E) Four (4) liquid tanks, identified as T50, T51, T52 and T53, each with a maximum storage capacity of 5,100 gallons.
 - (F) Six (6) liquid tanks, identified as T55, T56, T57, T58, T59, and T60, each with a maximum storage capacity of 610 gallons.
 - (G) Two (2) heated tanks, identified as HT3 and HT4, each with a maximum storage capacity of 54 gallons.
 - (11) Six (6) cooling towers.
 - (12) Two (2) natural gas fired oil heaters (identified as OH-1 and OH-2), each with a maximum heat input of 3.4 MMBtu per hour.
- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
- (1) One (1) PP plastic film manufacturing line (identified as PP Line 1), constructed in 1985, with a maximum throughput rate of 1,000 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 1A and 1B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage

- container), and one (1) winder. Emissions from the chill roll are exhausted through stack PP1-1. The scrap recycling system has a maximum throughput capacity of 131 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP1-2.
- (2) One (1) PP plastic film manufacturing line (identified as PP Line 2), constructed in 1988, with a maximum throughput rate of 1200 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 2A and 2B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted through stacks PP2-1 and PP2-2. The scrap recycling system has a maximum throughput capacity of 171 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP2-3.
- (3) One (1) PP plastic film manufacturing line (identified as PP Line 3), constructed in 1997, with a maximum throughput rate of 1400 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 3A and 3B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted through stack PP3-1. The scrap recycling system has a maximum throughput capacity of 179 pounds of PP per hour, controlled by a dust collector, and exhausting at stack PP3-2.
- (4) Polypropylene storage and handling systems, with a maximum throughput capacity of 3600 pounds per hour, including eight (8) silos (identified as Silos 9 through 16), five (5) storage hoppers, three (3) gravity feed weigh scales, and a mixing hopper. The storage silos are used to store polypropylene plastic resin pellets.
- (5) Two (2) cooling towers.
- (c) One (1) lacquer line (identified as LL1), with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches. This unit will be constructed in 2003.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

This permit to construct and 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 [326 IAC 2-8-1]

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 2-7 shall prevail.

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

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

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

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

B.5 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.6 Modification to Permit [326 IAC 2]

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

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

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

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 and an Operation Permit Validation Letter is issued.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Phase Construction Time Frame

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

- (a) Construction of one (1) lacquer line has not begun within eighteen (18) months from the effective date of this permit or if during the construction of one (1) lacquer line, work is suspended for a continuous period of one (1) year or more.

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

B.9 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) 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
Indianapolis, IN 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.10 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 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
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 PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its 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.11 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
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 nonroad engine, as defined in 40 CFR 89.2.

B.12 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] [IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and

air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.13 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.14 Annual Fee Payment [326 IAC 2-1.1-7]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

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

C.3 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 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
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.6 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the

provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 source 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.7 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.8 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a (*temperature or flow rate*), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.11 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within normal parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) 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.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.14 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
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 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

FACILITY OPERATION CONDITIONS

Facility Description:

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
- (1) One (1) PVC plastic film calender (identified as calender 1), constructed in 1999, with a maximum throughput rate of 1600 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 1-1.
 - (2) One (1) PVC plastic film calender (identified as calender 2), constructed in 2001, with a maximum throughput rate of 925 pounds of raw material per hour, and consisting of a PVC mixing area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL 2-1.
 - (3) One (1) PVC plastic film calender (identified as calender 3), constructed in 2003, with a maximum throughput rate of 1,800 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted through stack CAL 3-1.
 - (4) One (1) PVC plastic film calender (identified as calender 4), constructed in 2006, with a maximum throughput rate of 2,000 pounds of raw material per hour, and consisting of a PVC mix area, extruder, mill, calender, edge trimmer, and winder. Emissions from the extruder, mill, and calender are exhausted at stack CAL4-1.
 - (6) Two (2) weigh scale and mixing areas (identified as W1 and W6) consisting of weigh scales, hand mix facilities, and two (2) 750 gallon storage tanks (identified as Tanks 91 and 92). Each weigh scale area handles a maximum of 13,200 pounds per hour. Emissions are controlled by two (2) dust collectors, which exhausts at stacks PVC MIX-2 and PVC MIX-4.
 - (7) Two (2) dry scales, identified as W11 and W12, with a combined maximum capacity of 4,400 pounds per hour. Emissions from scales and bag stations are controlled by one (1) dust collector, which exhausts at stack PVC MIX-5.
 - (8) PVC storage and handling systems including a pneumatic conveyance system capable of handling 13,200 pounds of PVC per hour and eight (8) storage silos (identified as Silos 1 through 8).
 - (9) Nine (9) storage silos, with a pneumatic conveying system capable of handling 4,400 pounds of PVC per hour, consisting of the following:
 - (A) Three (3) PVC resin silos, identified as Silos 17, 18, and 19, each with a capacity of 5,540 cubic feet.
 - (B) Two (2) Interior big bag silos, identified as Silos 20 and 23, each with a capacity of 88 cubic feet.
 - (C) Four (4) Interior bag silos, identified as Silos 21, 22, 24, and 25, each with a capacity of 17 cubic feet.

(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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PVC film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
Calender Line 1	1,600	0.80	3.53
Calender Line 2	925	0.46	2.45
Calender Line 3	1,800	0.90	3.82
Calender Line 4	2,000	1.00	4.10
Each of the Two (2) Weigh Scale and Mixing Areas (W1 and W6)	13,200	6.60	14.5
Dry scale (W11 and W12)	4,400	2.20	6.95
PVC Handling (Silos 1 – 8)	13,200	6.60	14.5
PVC Handling (Silos 17 – 25)	4,400	2.20	6.95

The pounds per hour limitation was calculated using the following equation:

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

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

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

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 device.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 3 and 12 months after issuance of Notice Only Change 091-22656-00127 to MSOP 091-17752-00127, in order to demonstrate compliance with 326 IAC 2-6.1, the Permittee shall perform VOC testing for one of the PVC plastic film calenders (calender 1 through calender 4) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.4 Particulate Control

In order to comply with D.1.1, the dust collectors for particulate control shall be in operation and control emissions from the PVC manufacturing facilities at all times that the PVC manufacturing facilities are in operation.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse/dust collector used in conjunction with the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling, at least once per shift when the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse/dust collectors is outside the normal range of 1.5 and 7.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse/Dust Collector Inspections

An inspection shall be performed each calendar quarter of all bags controlling the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag/Dust Collector Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding

response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

Record Keeping and Reporting Requirement

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the weigh scale and mixing areas (identified as W1, W6, W11, and W12) and PVC handling stack exhaust once per shift.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.
- (d) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description:

- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
- (1) One (1) PP plastic film manufacturing line (identified as PP Line 1), constructed in 1985, with a maximum throughput rate of 1,000 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 1A and 1B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted at stack PP1-1. The scrap recycling system has a maximum throughput capacity of 131 pounds of PP per hour, controlled by a dust collector and exhausting at stack PP1-2.
 - (2) One (1) PP plastic film manufacturing line (identified as PP Line 2), constructed in 1988, with a maximum throughput rate of 1,200 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 2A and 2B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted at stacks PP2-1 and PP2-2. The scrap recycling system has a maximum throughput capacity of 171 pounds of PP per hour, controlled by a dust collector and exhausting at stack PP2-3.
 - (3) One (1) PP plastic film manufacturing line (identified as PP Line 3), constructed in 1997, with a maximum throughput rate of 1,400 pounds of raw material per hour, and consisting of one (1) PP mixing area, two (2) dosers, two (2) extruders (identified as 3A and 3B), one (1) die, one (1) chill roll, one (1) corona treatment area, one (1) scrap recycling system (consisting of an edge trimmer, granulator, pneumatic conveyance system with two (2) cyclones, and scrap storage container), and one (1) winder. Emissions from the chill roll are exhausted through stack PP3-1. The scrap recycling system has a maximum throughput capacity of 179 pounds of PP per hour, controlled by a dust collector and exhausting at stack PP3-2.
 - (4) Polypropylene storage and handling systems, with a maximum throughput capacity of 3,600 pounds per hour, including eight (8) silos (identified as Silos 9 through 16), five (5) storage hoppers, three (3) gravity feed weigh scales, and a mixing hopper. The storage silos are used to store polypropylene plastic resin pellets.

(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 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the PP film manufacturing facilities shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
PP Line 1	1000	0.50	2.58
PP Line 1 Scrap Grinding	131	0.07	0.66
PP Line 2	1200	0.60	2.91
PP Line 2 Scrap Grinding	171	0.09	0.79
PP Line 3	1400	0.70	3.23

Emission Units	Process Weight		Particulate Emission Limit (lb per hour)
	(lb per hour)	(ton per hour)	
PP Line 3 Scrap Grinding	179	0.09	0.81
PP Handling	3600	1.80	6.08

The pounds per hour limitation was calculated using the following equation:

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

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

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

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with D.2.1, the dust collectors for particulate control shall be in operation and control emissions from the PP manufacturing facilities at all times that the PP manufacturing facilities are in operation.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description:

- (c) One (1) lacquer line (identified as LL1), with one (1) rotogravure roll press with a maximum line speed of 131.2 feet per minute and maximum coating width of 63 inches. This unit will be constructed in 2003.

(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 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the one (1) lacquer line with one (1) rotogravure roll press as described in this section except when otherwise specified in 40 CFR Part 60, Subpart FFF.

D.3.2 VOC [326 IAC 12-1][40 CFR Part 60, Subpart FFF]

Pursuant to 40 CFR 60.582(a)(1), the Permittee shall use inks with a weighted average VOC content less than one (1) kilogram VOC per kilogram ink solids at the affected facility.

D.3.3 Volatile Organic Compounds (VOCs) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating), the volatile organic compound (VOC) content of the coating from one (1) lacquer line with one (1) rotogravure roll press shall be limited to 4.8 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator.

D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.2 and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the Δ as supplied Δ and Δ as applied Δ VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.5 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 this facility.

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

D.3.6 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2 and D.3.3, the Permittee shall maintain monthly records of the VOC content of each coating material and solvent used.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description:

- (a) Polyvinyl chloride (PVC) film manufacturing facilities consisting of the following units:
 - (5) Eight (8) liquid scale areas (identified as W2, W3, W4, W5, W7, W8, W9 and W10).
 - (10) Thirty-one (31) storage tanks, comprising:
 - (A) Ten (10) storage tanks (identified as T-31 through T-34, T-38, and T-40 through T-44), each having a maximum storage capacity of 65 gallons.
 - (B) Four (4) storage tanks (identified as T-45 through T48), each having a maximum storage capacity of 8,086 gallons.
 - (C) Two (2) holding tanks (identified as HT-1 and HT-2), each having a maximum storage capacity of 52.8 gallons.
 - (D) Three (3) storage tanks (identified as T-35, T-36, and T-37), each having a maximum capacity of 85 gallons.
 - (E) Four (4) liquid tanks, identified as T50, T51, T52 and T53, each with a maximum storage capacity of 5,100 gallons.
 - (F) Six (6) liquid tanks, identified as T55, T56, T57, T58, T59, and T60, each with a maximum storage capacity of 610 gallons.
 - (G) Two (2) heated tanks, identified as HT3 and HT4, each with a maximum storage capacity of 54 gallons.
 - (11) Six (6) cooling towers.
 - (12) Two (2) natural gas fired oil heaters (identified as OH-1 and OH-2), each with a maximum heat input of 3.4 MMBtu per hour.
- (b) Polypropylene (PP) film manufacturing facilities consisting of the following units:
 - (5) Two (2) cooling towers.

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

Emission Limitations and Standards

There are no specifically applicable regulations included in this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	American Renolit Corporation
Address:	1207 East Lincolnway
City:	LaPorte, Indiana 46350
Phone #:	(219) 324-6886
MSOP #:	091-17752-00127

American Renolit Corporation is

9 still in operation.
9 no longer in operation.

American Renolit Corporation is

9 in compliance with the requirements of MSOP 091-17752-00127.
9 not in compliance with the requirements of MSOP 091-17752-00127.

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

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

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 ?_____, 100TONS/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:

**Appendix A: Emission Calculations
PM/PM10 Emissions**

Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
NOC to MSOP: 091-22656-00127
Reviewer: ERG/ST
Date: March 10, 2006

Emission Units	Maximum Throughput (lbs/hour)	PM/PM10 Emission Factor (lbs/lb material)	Control Efficiency (%)	PTE of PM/PM10 Before Controls (tons/year)	PTE of PM/PM10 After Controls (tons/year)
PVC MIX-5	4,400	9.70E-05	99.0%	1.87	0.02
CAL 4-1	2,000	2.7E-04	75.0%	2.37	0.59
TOTAL				4.23	0.61

Emission factor is from calculations for MSOP 091-17752-00127, issued on November 3, 2003.

METHODOLOGY

PTE of PM/PM10 Before Controls (tons/year) = Maximum Throughput (lbs/hour) x Emission Factor (lbs/lb material) x 8760 (hours/year) x 1 ton/2,000 lbs

PTE of PM/PM10 After Controls (tons/year) = Amount of Material Collected (tons/year) *1/Actual Collection Efficiency %

**Appendix A: Emission Calculations
VOC Emissions for CAL4-1**

Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
NOC to MSOP: 091-22656-00127
Reviewer: ERG/ST
Date: March 10, 2006

Emission Units	Maximum Process Rate (lbs/hour)	Emission Factor (lb of VOC/lb of Product)	PTE of VOC (tons/year)
CAL4-1	2,000	0.00082	7.18

Note:

The emission factor of 0.00082 lbs of VOC/lb of product is from a document called "Effect of Plasticizer Type and Level on Simulated Process Emissions From Experimental Flexible Polyvinyl Chloride Compounds" prepared by the Vinyl Institute. The emission factor is 653.49 milligrams of VOC per kilogram of product. However, this source uses a higher torque, therefore, this number should be increased by 25%. This increase results in an emission factor of 816.9 milligrams of VOC per kilogram of product, which is equivalent to 0.00082 pounds of VOC per pound of product.

METHODOLOGY

PTE of VOC (tons/year) = Maximum Process Rate (lbs/hour) x Emission Factor (lb of VOC/lb of Product) x 1 ton/2000 lbs x 8760 (hours/year)

Appendix A: Emission Calculations
HAP Emissions for CAL4-1

Company Name: American Renolit Corporation
Address: 1207 East Lincolnway, LaPorte, Indiana 46350
NOC to MSOP: 091-22656-00127
Reviewer: ERG/ST
Date: March 10, 2006

HAP	* Emission Factor (lbs/lb processed)	Maximum Material Throughput (lbs/hour)	PTE of HAPs (tons/year)
Acetophenone	9.10E-07	2,000	0.008
Bis (2-ethylhexyl)phthalate (DEHP)	2.30E-05	2,000	0.20
Phenol	2.97E-04	2,000	2.60
Vinyl Chloride Monomer (VCM)	2.40E-04	2,000	2.10
		TOTAL	4.91

* Emission factors are from "Effect of Pasticizer Type and Level on Simulated Process Emissions From Experimental Flexible Polyvinyl Chloride Compounds" published by The Vinyl Institute and Chemical Fabrics and Film Association, Inc. (1997).

METHODOLOGY

PTE of HAPs (tons/year) = Maximum Material Throughput (lbs/hour) x Emission Factor (lbs HAP/lb material) x 8760 (hours/year) x 1 ton/2000 lbs