INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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: April 18, 2007

RE: Spartech Plastics / 035-23122-00078

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06

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NEW SOURCE CONSTRUCTION PERMIT AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Spartech Plastics
1401 East Memorial Drive
Muncie, Indiana 47302

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: M 035-23122-00078	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 18, 2007 Expiration Date: April 18, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a plastic sheet and molded plastics plant.

Source Address:	1401 East Memorial Drive, Muncie, Indiana 47302
Mailing Address:	1401 East Memorial Drive, Muncie, Indiana 47302
General Source Phone:	765-281-5120
SIC Code:	3089
County Location:	Delaware
Source Location Status:	Attainment area for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) railcar unloading operation, consisting of three (3) separate pneumatic material transfer systems, identified as RRUL, constructed in 1984, with a combined maximum capacity of 33,000 lbs of plastic pellets per hour, and a maximum annual capacity of 57,159 tons per year (TPY), with plastic pellets conveyed pneumatically to silos.

(b) Twelve (12) silos, identified as S1 through S12, constructed in 1984, for storing plastic pellets, using no controls, and venting outside the building.

(c) Five (5) coextruder lines, identified as COEX1 through COEX5, for extruding multiple layers of plastic sheeting, with a combined maximum capacity of 13,050 pounds of plastic per hour, with no particulate or VOC emission controls.

Emission Unit ID	Maximum Throughput Rate (lbs/hour)	Construction Date	Vent ID
COEX1	2,800	1984	COEX1
COEX2	3,000	1987	COEX2
COEX3	2,400	1994	COEX3
COEX4	350	1990	COEX4
COEX5	4,500	2005	COEX5

Note: COEX4 currently functions as a Research and Development facility. The Permittee will convert COEX4 to production use in this permit.

(d) Five (5) granulators for grinding scrap plastic (regrind) from coextruder lines, identified as COEXG1 through COEXG5, with a maximum combined capacity of 1,435 pounds of regrind per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled with bin vent filters, and venting inside or outside the building.

(e) One (1) Slitter/Trimmer/Rewinder, identified as SR1 constructed in 1985, with a maximum regrinding capacity of 1,000 pounds of plastic product per hour, with trimmings pneumatically conveyed to the granulators, and venting inside the building.

(f) Nine (9) thermoformers, identified as F1 through F4 and F6 through F10, using electric heating elements to re-form plastic products, using no controls and venting inside the building.

(g) Nine (9) granulators for grinding scrap plastic from thermoformer lines, identified as FG1 through FG4 and FG6 through FG10, with a maximum combined capacity of 2,000 pounds per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled with bin vent filters, and venting inside the building.

(h) Two (2) enclosed Granulators, identified as G1 and G2, constructed in 1984, with a combined maximum regrinding capacity of 7,000 pounds of plastic waste per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled by a bin vent filter and venting inside the building.

(i) Two (2) printers, identified as P8 and P9, both constructed in 1994, each with a maximum printing capacity of 25,200 parts (1,050 square feet of plastic) per hour, each using a 0.078 MMBtu per hour direct flame preheater, applying UV inks and using a light cure process, using no controls and venting to stacks P8 and P9, respectively.

(j) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of forty-four (44) space heaters as follows:

(1) One (1) heater, identified as MAM1, with a maximum capacity of 0.510 MMBtu per hour.

(2) Three (3) heaters, identified as MAM2 through MAM4, each with a maximum capacity of 1.560 MMBtu per hour.

(3) Four (4) heaters, identified as AHU1, AHU3, AHU5, and AHU6, each with a maximum capacity of 0.400 MMBtu per hour.

(4) Eighteen (18) heaters, identified as 1B, 1A, 4A, 5A, 6A, 7A, 8A, 10A, 11A, 12A, 13A, 2B, 3B, 10B, 11B, 12B, 13B, and 14B, each with a maximum capacity of 0.170 MMBtu per hour.

(5) Six (6) heaters, identified as 9A, 5B, 6B, 7B, 8B, and 9B, each with a maximum capacity of 0.300 MMBtu per hour.

(6) Two (2) heaters, identified as 3A and 4B, each with a maximum capacity of 0.060 MMBtu per hour.

(7) Six (6) HVAC units, identified as HVAC1, HVAC3, HVAC5, HVAC6, HVAC8, and HVAC32, with a combined total maximum capacity of 0.695 MMBtu per hour.

(8) Four (4) heaters, identified as 15B, 16B, 17B, and 18B, each with a maximum capacity of 0.200 MMBtu per hour.

(k) VOC and HAP storage containers, consisting of vessels storing lubricating oils, hydraulic oils, machining oils, or machining fluids.

(l) Production related activities, including the application of oils, greases, lubricants, and/or nonvolatile material, as temporary protective coatings.

(m) Machining where an aqueous cutting coolant continuously floods the machining interface.

(n) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months and not subject to 326 IAC 20-6, consisting of one (1) Solvent Part Tub, and using Crystal Clean solvent.

(o) Closed loop heating and cooling systems.

(p) Exposure chambers (towers or columns), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.

(q) Noncontact cooling tower systems with either of the following:

(1) Natural draft cooling towers not regulated under a NESHAP, or

(2) Forced and induced draft cooling tower systems not regulated under a NESHAP.

(r) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(s) Heat exchanger cleaning and repair.

(t) Paved and unpaved roads and parking lots with public access.

(u) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including purging of gas lines and/or purging of vessels.

(v) Blowdown for the following: sight glass, boiler, cooling tower, compressors and/or pumps.

(w) Emergency natural gas turbines or reciprocating engines not exceeding sixteen thousand (16,000) horsepower, consisting of one (1) four stroke lean burn spark ignition natural gas-fired emergency backup electric generator, identified as Generator1, constructed in 1984, with a maximum capacity of 0.125 megawatts and 187 horsepower, and exhausting to stack Gen1.

(x) One (1) stationary fire pump engine, consisting of a diesel compression ignition engine, with a displacement of 5.9 liters, installed in 1984 and modified in 2004.

(y) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM10; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 5 lb/day or 1.0 ton/yr of a single HAP, and 12.5 lb/day or 2.5 ton/yr of any combination of HAPs, consisting of:

(1) Two (2) vacuum-sealed electric burnout units, identified as Burnout 1 and Burnout 2, for melting plastic off machine parts in a sealed chamber under vacuum, using no controls and exhausting inside the building.

(2) One (1) parts cleaning unit, identified as Aqueous Parts Tub, using 360 gallons of MiraChem 500 solvent per year.

(3) Twenty (20) pneumatic conveyors for transporting plastic pellets or regrind from the silos, surge bins or containers to the coextruder input feed for processing, with a maximum combined capacity of 13,050 pounds per hour, with particulate emissions controlled with bin vent filters, and venting inside or outside the building.

(z) One (1) thermoformer, identified as F5, approved for construction in 2007, using electric heating elements to re-form plastic products, using no controls and venting inside the building.

(aa) One (1) granulator for grinding scrap plastic from thermoformer line F5, identified as FG5, approved for construction in 2007, with a maximum capacity of 250 pounds per hour, with regrind pneumatically conveyed to a surge bin, with particulate emissions controlled with bin vent filters, and venting inside the building.

(bb) One (1) printer, identified as P10, approved for construction in 2007, with a maximum printing capacity of 1,050 square feet of plastic per hour, using a 0.078 MMBtu per hour direct flame preheater, applying UV inks and using a light cure process, using no controls and venting to stack P10.

(cc) One (1) printer, identified as P4, approved for construction in 2007, with a maximum printing capacity of 1,050 square feet of plastic per hour, using a 0.078 MMBtu per hour direct flame preheater, applying UV inks and using a light cure process, using no controls and venting to stack P4.

(dd) One (1) parts cleaning unit, identified as Aqueous Parts Tub 2, using 100 gallons of Ozzy Juice 8W-3 per year and approved for construction in 2007.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1 shall prevail.

B.2 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.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) 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 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5] [IC13-15-3-6(a)]

(a) This permit, 035-23122-00078, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.7 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.8 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.9 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1. Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual 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 annual notice 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, Indiana 46204-2251

(c) 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.12 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 facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to 035-23122-00078 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.15 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 2-6.1-6(d)]

B.17 Source Modification Requirement

A modification, construction, or reconstruction is governed by 326 IAC 2.

B.18 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and

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

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

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

B.19 Transfer of Ownership or Operation [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6-1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 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, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.21 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 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.7 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 2-1.1-1(1).

(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 [326 IAC 2-6.1-5(a)(2)]

C.8 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. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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.10 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.11 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.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

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

Record Keeping and Reporting Requirements

C.14 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.15 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.16 General Reporting Requirements [326 IAC 2-1.1-1(1)] [326 IAC 2-6.1-5] [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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do 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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

(a) One (1) railcar unloading operation, consisting of three (3) separate pneumatic material transfer systems, identified as RRUL, constructed in 1984, with a combined maximum capacity of 33,000 lbs of plastic pellets per hour, and a maximum annual capacity of 57,159 tons per year (TPY), with plastic pellets conveyed pneumatically to silos.

(b) Twelve (12) silos, identified as S1 through S12, constructed in 1984, for storing plastic pellets, using no controls, and venting outside the building.

(c) Five (5) coextruder lines, identified as COEX1 through COEX5, for extruding multiple layers of plastic sheeting, with a combined maximum capacity of 13,050 pounds of plastic per hour, with no particulate or VOC emission controls.

Emission Unit ID	Maximum Throughput Rate (lbs/hour)	Construction Date	Vent ID
COEX1	2,800	1984	COEX1
COEX2	3,000	1987	COEX2
COEX3	2,400	1994	COEX3
COEX4	350	1990	COEX4
COEX5	4,500	2005	COEX5

(d) Five (5) granulators for grinding scrap plastic (regrind) from coextruder lines, identified as COEXG1 through COEXG5, with a maximum combined capacity of 1,435 pounds of regrind per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled with bin vent filters, and venting inside or outside the building.

(e) One (1) Slitter/Trimmer/Rewinder, identified as SR1 constructed in 1985, with a maximum regrinding capacity of 1,000 pounds of plastic product per hour, with trimmings pneumatically conveyed to the granulators, and venting inside the building.

(g) Nine (9) granulators for grinding scrap plastic from thermoformer lines, identified as FG1 through FG4 and FG6 through FG10, with a maximum combined capacity of 2,000 pounds per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled with bin vent filters, and venting inside the building.

(h) Two (2) enclosed Granulators, identified as G1 and G2, constructed in 1984, with a combined maximum regrinding capacity of 7,000 pounds of plastic waste per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled by a bin vent filter and venting inside the building.

(w) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM10; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 5 lb/day or 1.0 ton/yr of a single HAP, and 12.5 lb/day or 2.5 ton/yr of any combination of HAPs, consisting of:

(3) Twenty (20) pneumatic conveyors for transporting plastic pellets or regrind from the silos, surge bins or containers to the coextruder input feed for processing, with a maximum combined capacity of 13,050 pounds per hour, with particulate emissions controlled with bin vent filters, and venting inside or outside the building.

(aa) One (1) granulator for grinding scrap plastic from thermoformer line F5, identified as FG5, approved for construction in 2007, with a maximum capacity of 250 pounds per hour, with regrind pneumatically conveyed to a surge bin, with particulate emissions controlled with bin vent filters, and venting inside the building.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the manufacturing facilities shall be limited as listed in the following table:

Emission Unit ID	Maximum Throughput (lbs/hour)	Allowable Emissions (lbs/hour)	Control Unit ID
Unloading RRUL	33,000	26.8	Screens
Silos S1 – S12			
CoExtruder COEX1	2,800	5.14	none
CoExtruder COEX2	3,000	5.38	
CoExtruder COEX3	2,400	4.63	
CoExtruder COEX4	350	1.28	
CoExtruder COEX5	4,500	7.06	
Coextruder Granulators/Conveyors COEXG1 - COEXG5	1,435	3.28	Bin vent filters
Thermoformer Granulators/Conveyors FG1 - FG10	2,250	4.44	
Slitter/Trimmer/Rewinder SR1	1,000	2.58	
Granulators G1 and G2	7,000	9.49	
Pneumatic Conveyors	13,050	14.4	

The pounds per hour limitation was calculated with 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;
P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.2 Particulate Control

In order to comply with 326 IAC 6-3-2 and Condition D.1.1, the screens and filters for the Unloading (RRUL), Silos (S1 – S12), the Coextruder Granulators/ Conveyors (COEXG1 - COEXG5), the Thermoformer Granulators/Conveyors (FG1 - FG10), the Slitter/Trimmer/Rewinder (SR1), the Granulators (G1, G2), and the pneumatic conveyors shall be in operation at all times that these facilities are in operation.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Degreaser

(l) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of one (1) Solvent Parts Tub, using Crystal Clean solvent.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	**Spartech Plastics**
Address:	**1401 East Memorial Drive**
City:	**Muncie, Indiana 47302**
Phone #:	**(765) 281-5120**
MSOP #:	**035-23122-00078**

I hereby certify that Spartech Plastics is ☐ still in operation.
☐ no longer in operation.

I hereby certify that Spartech Plastics is ☐ in compliance with the requirements of MSOP 035-23122-00078.
☐ not in compliance with the requirements of MSOP 035-23122-00078.

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

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 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 PERMI 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:

_____
_____

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Spartech Plastics
1401 East Memorial Drive
Muncie, Indiana 47302

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for Spartech Plastics.
(Title)

3. By virtue of my position with Spartech Plastics, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Spartech Plastics.

4. I hereby certify that Spartech Plastics, 1401 East Memorial Drive, Muncie, Indiana 47302, completed construction of the printer (P10) and thermoformer (F5) on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 23, 2006 and as permitted pursuant to New Source Review and Minor Source Operating Permit No. 035-23122-00078, Plant ID No. 035-00078 issued on _____.

5. Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature_____

Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires:

Signature_____

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name:	Spartech Plastics
Source Location:	1401 East Memorial Drive, Muncie, Indiana 47302
County:	Delaware
SIC Code:	3089
Permit No.:	035-23122-00078
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed an application from Spartech Plastics relating to the construction and operation of a plastic sheet and molded plastics plant.

History and Background

This source began operations in 1984. On May 23, 2006, Spartech Plastics submitted an application for a Minor Source Operating Permit. The Permittee plans to add additional emission units (P4, P10, and F5) to their existing facilities and to change the function of an existing facility (COEX4) from research to production.

Existing Emission Units and Pollution Control Equipment Not Previously Requiring a Permit

(a) One (1) railcar unloading operation, consisting of three (3) separate pneumatic material transfer systems, identified as RRUL, constructed in 1984, with a combined maximum capacity of 33,000 lbs of plastic pellets per hour, and a maximum annual capacity of 57,159 tons per year (TPY), with plastic pellets conveyed pneumatically to silos.

(b) Twelve (12) silos, identified as S1 through S12, constructed in 1984, for storing plastic pellets, using no controls, and venting outside the building.

(c) Five (5) coextruder lines, identified as COEX1 through COEX5, for extruding multiple layers of plastic sheeting, with a combined maximum capacity of 13,050 pounds of plastic per hour, with no particulate or VOC emission controls.

Emission Unit ID	Maximum Throughput Rate (lbs/hour)	Construction Date	Vent ID
COEX1	2,800	1984	COEX1
COEX2	3,000	1987	COEX2
COEX3	2,400	1994	COEX3
COEX4	350	1990	COEX4
COEX5	4,500	2005	COEX5

Note: COEX4 currently functions as a Research and Development facility. The Permittee will convert COEX4 to production use in this permit.

(d) Five (5) granulators for grinding scrap plastic (regrind) from coextruder lines, identified as COEXG1 through COEXG5, with a maximum combined capacity of 1,435 pounds of regrind per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled with bin vent filters, and venting inside or outside the building.

(e) One (1) Slitter/Trimmer/Rewinder, identified as SR1 constructed in 1985, with a maximum regrinding capacity of 1,000 pounds of plastic product per hour, with trimmings pneumatically conveyed to the granulators, and venting inside the building.

(f) Nine (9) thermoformers, identified as F1 through F4 and F6 through F10, using electric heating elements to re-form plastic products, using no controls and venting inside the building.

(g) Nine (9) granulators for grinding scrap plastic from thermoformer lines, identified as FG1 through FG4 and FG6 through FG10, with a maximum combined capacity of 2,000 pounds per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled with bin vent filters, and venting inside the building.

(h) Two (2) enclosed Granulators, identified as G1 and G2, constructed in 1984, with a combined maximum regrinding capacity of 7,000 pounds of plastic waste per hour, with regrind pneumatically conveyed to surge bins, with particulate emissions controlled by a bin vent filter and venting inside the building.

(i) Two (2) printers, identified as P8 and P9, both constructed in 1994, each with a maximum printing capacity of 25,200 parts (1,050 square feet of plastic) per hour, each using a 0.078 MMBtu per hour direct flame preheater, applying UV inks and using a light cure process, using no controls and venting to stacks P8 and P9, respectively.

(j) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of forty-four (44) space heaters as follows:

(1) One (1) heater, identified as MAM1, with a maximum capacity of 0.510 MMBtu per hour.

(2) Three (3) heaters, identified as MAM2 through MAM4, each with a maximum capacity of 1.560 MMBtu per hour.

(3) Four (4) heaters, identified as AHU1, AHU3, AHU5, and AHU6, each with a maximum capacity of 0.400 MMBtu per hour.

(4) Eighteen (18) heaters, identified as 1B, 1A, 4A, 5A, 6A, 7A, 8A, 10A, 11A, 12A, 13A, 2B, 3B, 10B, 11B, 12B, 13B, and 14B, each with a maximum capacity of 0.170 MMBtu per hour.

(5) Six (6) heaters, identified as 9A, 5B, 6B, 7B, 8B, and 9B, each with a maximum capacity of 0.300 MMBtu per hour.

(6) Two (2) heaters, identified as 3A and 4B, each with a maximum capacity of 0.060 MMBtu per hour.

(7) Six (6) HVAC units, identified as HVAC1, HVAC3, HVAC5, HVAC6, HVAC8, and HVAC32, with a combined total maximum capacity of 0.695 MMBtu per hour.

(8) Four (4) heaters, identified as 15B, 16B, 17B, and 18B, each with a maximum capacity of 0.200 MMBtu per hour.

(k) VOC and HAP storage containers, consisting of vessels storing lubricating oils, hydraulic oils, machining oils, or machining fluids.

(l) Production related activities, including the application of oils, greases, lubricants, and/or nonvolatile material, as temporary protective coatings.

(m) Machining where an aqueous cutting coolant continuously floods the machining interface.

(n) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months and not subject to 326 IAC 20-6, consisting of one (1) Solvent Part Tub, and using Crystal Clean solvent.

(o) Closed loop heating and cooling systems.

(p) Exposure chambers (towers or columns), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.

(q) Noncontact cooling tower systems with either of the following:

(1) Natural draft cooling towers not regulated under a NESHAP, or

(2) Forced and induced draft cooling tower systems not regulated under a NESHAP.

(r) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(s) Heat exchanger cleaning and repair.

(t) Paved and unpaved roads and parking lots with public access.

(u) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including purging of gas lines and/or purging of vessels.

(v) Blowdown for the following: sight glass, boiler, cooling tower, compressors and/or pumps.

(w) Emergency natural gas turbines or reciprocating engines not exceeding sixteen thousand (16,000) horsepower, consisting of one (1) four stroke lean burn spark ignition natural gas-fired emergency backup electric generator, identified as Generator1, constructed in 1984, with a maximum capacity of 0.125 megawatts and 187 horsepower, and exhausting to stack Gen1.

(x) One (1) stationary fire pump engine, consisting of a diesel compression ignition engine, with a displacement of 5.9 liters, installed in 1984 and replaced in 2004.

(y) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM10; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 5 lb/day or 1.0 ton/yr of a single HAP, and 12.5 lb/day or 2.5 ton/yr of any combination of HAPs, consisting of:

(1) Two (2) vacuum-sealed electric burnout units, identified as Burnout 1 and Burnout 2, for melting plastic off machine parts in a sealed chamber under vacuum, using no controls and exhausting inside the building.

(2) Two (2) parts cleaning unit, identified as Aqueous Parts Tub 1 and 2, using 360 gallons of MiraChem 500 solvent per year and 100 gallons of Ozzy Juice 8W-3 per year, respectively.

(3) Twenty (20) pneumatic conveyors for transporting plastic pellets or regrind from the silos, surge bins or containers to the coextruder input feed for processing, with a maximum combined capacity of 13,050 pounds per hour, with particulate emissions controlled with bin vent filters, and venting inside or outside the building.

New Emission Units and Pollution Control Equipment

(z) One (1) thermoformer, identified as F5, approved for construction in 2007, using electric heating elements to re-form plastic products, using no controls and venting inside the building.

(aa) One (1) granulator for grinding scrap plastic from thermoformer line F5, identified as FG5, approved for construction in 2007, with a maximum capacity of 250 pounds per hour, with regrind pneumatically conveyed to a surge bin, with particulate emissions controlled with bin vent filters, and venting inside the building.

(bb) One (1) printer, identified as P10, approved for construction in 2007, with a maximum printing capacity of 1,050 square feet of plastic per hour, using a 0.078 MMBtu per hour direct flame preheater, applying UV inks and using a light cure process, using no controls and venting to stack P10.

(cc) One (1) printer, identified as P4, approved for construction in 2007, with a maximum printing capacity of 1,050 square feet of plastic per hour, using a 0.078 MMBtu per hour direct flame preheater, applying UV inks and using a light cure process, using no controls and venting to stack P4.

(dd) One (1) parts cleaning unit, identified as Aqueous Parts Tub 2, using 100 gallons of Ozzy Juice 8W-3 per year and approved for construction in 2007.

Existing Approvals

This is the first permit to be issued to this source.

Air Pollution Control Justification as an Integral Part of the Process

As part of their MSOP application, the company submitted the following justification such that the silo vent screens, bin vent filters, and vacuum pump filters controlling particulate emissions from Silos 1 through 12, the pneumatic conveyors, and the granulators be considered as an integral part of the manufacture of plastic sheeting process:

(a) During unloading, the raw materials for this plastic sheet manufacturing process (plastic pellets) are pneumatically conveyed from the railcar/truck unloading (RRUL) to the silos. Screened vents on the silo equalize pressure from the pneumatic transfer system. No bin vent filters are necessary as all materials handled are pelletized plastic, with negligible particulate emissions.

The Permittee did not provide data on cost and savings of these devices to show an "overwhelming economic benefit." IDEM, OAQ has evaluated the raw materials pneumatic conveying systems and has determined that the vent screens are not integral to the pneumatic conveying process. Therefore, the permitting level will be determined using the potential to emit before the screens.

(b) The plastic pellets are pneumatically conveyed from the silos, containers and surge bins to the coextruders. The pneumatic conveyors are fully enclosed vacuum pump systems that draw material from storage to the machine feed hoppers. Air is drawn through filters prior to entering the vacuum pump. The filters are required to protect the vacuum pump system. The use of the vacuum pump without the filter would result in pump failure, which in turn would result in off specification product and the shutdown of the production line. The pumps vent inside or outside the building, depending upon the process. The primary function of the filters on the pneumatic conveyance vacuum units is to prevent the failure of the vacuum pump system.

IDEM, OAQ has evaluated the vacuum pump pneumatic conveying systems and has determined that the filters perform a vital function and are integral to the vacuum

conveying process. Therefore, the permitting level will be determined using the potential to emit after the filters.

(c) Waste from the coextruders, thermoformers, and Slitter/Trimmer/Rewinder is collected and ground in granulators for each process line, then pneumatically conveyed using pressure blowers to surge bins equipped with bin vent filters. The bin vent filters serve to neutralize air pressure at the end of the transport train and separate raw materials from air prior to storage or further processing.

The Permittee did not provide data on cost and savings of these devices to show an "overwhelming economic benefit." IDEM, OAQ has evaluated these justifications and determined that the bin vent filters controlling particulate emissions from the granulators, the pressure blowers, and the surge bins are not integral parts of the plastics extrusion process. Therefore, the permitting level will be determined using the potential to emit before the bin vent filters.

Operating conditions in the proposed permit will specify that the screens, vacuum pump filters, and bin vent filters shall operate at all times when the plastic process is in operation.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack/ Vent ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{o}F)
COEX1	COEX1	38	1.67	1,000	Ambient
COEX2	COEX2	34	1.5	1,000	Ambient
COEX3	COEX3	22	1.17	1,000	Ambient
COEX4	COEX4	22	1.14	1,000	Ambient
COEX5	COEX5	29	1.14	1,000	Ambient
Gen1	Generator	10	0.33	NA	200
P4	P4	23	0.67	700	Ambient
P8	P8	23	0.67	700	Ambient
P9	P9	23	0.67	700	Ambient
P10	P10	23	0.67	700	Ambient
Various	Nat. Gas Heaters	varies	varies	varies	200

Note: Although P8 and P9 currently vent inside the building, the Permittee proposes to vent these emission units, along with P10 and P4, to individual stacks.

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 March 23, 2006, with additional information received on June 2, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 8).

Potential to Emit of the Source Before Controls

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

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

Pollutant	Potential to Emit (tons/year)
PM	23.9
PM10	23.8
SO_2	0.14
VOC	20.4
CO	5.2
NO_x	7.4

HAPs	Potential to Emit (tons/year)
Styrene	1.06
Ethylbenzene	0.15
Ethyl acetate	0.83
All Others	0.14
Total	2.17

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all critieria pollutants are less than 25 tons per year. However, the source has requested that a Minor Source Operating Permit be issued under the the provisions of 326 IAC 2-6.1. The source will be issued a Minor Source Operating Permit.

(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 not subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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.

County Attainment Status

The source is located in Delaware County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 re-designating Delaware County to attainment for the eight-hour ozone standard and revoking the one-hour ozone standard in Indiana.

(a) Delaware County has been classified as attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability-Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard.

Delaware County has been designated as attainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)). See the State Rule Applicability – Entire Source section.

(c) Delaware County has been classified as attainment or unclassifiable in Indiana for all other 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 – Entire Source section.

Source Status

New Source PSD 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	22.3
PM-10	22.2
SO_2	0.14
VOC	20.4
CO	5.2
NO_x	7.4
Single HAP	1.06
Combination HAPs	2.17

This source is not a major stationary source under PSD because no attainment 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 new 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 first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

(c) The requirements of 326 IAC 20 and 40 CFR Part 63, Subpart T (National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning) are not included in the permit. The parts cleaning operations do not use a solvent containing methylene chloride, perchlorethylene, trichlorethylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR 63.4480, Subpart PPPP) are not

included in this permit for this source. This source is a minor source of HAP, as defined in 40 CFR 63.2.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating (40 CFR 63.3280, Subpart JJJJ) are not included in this permit for this source. This source is a minor source of HAP, as defined in 40 CFR 63.2.

(f) The requirements of the New Source Performance Standards for Incinerators (326 IAC 12, 40 CFR 60, Subpart E) are not included in this permit for the two (2) electric burnout units (Burnout 1 and Burnout 2) because these units are not incinerators, as that term is defined in 40 CFR 60.51(a). These units melt plastic off machine parts at temperatures below the combustion temperature of the plastic.

(g) The requirements of the New Source Performance Standards for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 (326 IAC 12, 40 CFR Part 60, Subpart AAAA) are not included in this permit for the electric burnout units (Burnout 1 and Burnout 2) because these units are not used to incinerate waste that meets the definition of "municipal solid waste" contained in 40 CFR 60.1465.

(h) The requirements of the New Source Performance Standards for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001 (326 IAC 12, 40 CFR Part 60, Subpart CCCC) are not included in this permit for the electric burnout units (Burnout 1 and Burnout 2) because these units do not combust commercial or industrial waste.

(i) The requirements of the New Source Performance Standards for Other Solid Waste Incineration Units For Which Construction Is Commenced After December 9, 2004, Or For Which Modification Or Reconstruction Is Commenced On Or After June 16, 2006 (40 CFR Part 60, Subpart EEEE) are not included in this permit for the electric burnout units (Burnout 1 and Burnout 2) because these units do not meet the definition of municipal waste combustion units or institutional waste combustion units.

(j) The requirements of the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (326 IAC 12, 40 CFR 60.4200 - 4209, Subpart IIII) are not included in this permit for the diesel-fired emergency fire pump engine because this compression ignition internal combustion engine commenced construction and was modified prior to July 11, 2005.

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ are not included in this permit for the emergency generator (Gen 1). This source is a minor source of HAP, as defined in 40 CFR 63.2.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, fugitive emissions of VOC and PM are not counted towards applicability of PSD.

This source was constructed in 1984. At the time of construction, the PTE for PM, PM10, VOC, CO, NOx, and SO_2 was less than 250 tons per year and Delaware County was designated as attainment for all criteria pollutants at that time. The source was a minor source under PSD. There have been no major modifications since the source was constructed. The PTE for PM, PM10, VOC, CO, NOx, and SO_2 for the entire source remains less than 250 tons per year. Therefore, the source is a minor source under PSD.

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

The operation of the extruders and the printing emit less than 10 tons per year of a single HAP and less than 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 located in Delaware County, is not required to operate under a Part 70 permit, and does not emit lead into the ambient air at levels greater than or equal to five (5) tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 436 IAC 2-6-5.

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.

326 IAC 6-4 (Fugitive Dust Emissions)

The source is subject to 326 IAC 6-4 (Fugitive Dust Emissions) because the source maintains paved and unpaved roads and parking lots with public access. 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).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in Delaware County.

(a) This source is not located in any of the areas listed in 326 IAC 6-5-1(a). Therefore, this source is not subject to the requirements of 326 IAC 6-5.

(b) This source did not receive all of the necessary preconstruction approvals prior to December 13, 1985. However, the fugitive particulate emissions from the paved and unpaved roads and parking lots are negligible. Pursuant to 326 IAC 6-5-7(d), this source is exempt from the requirements of 326 IAC 6-5.

State Rule Applicability – Individual Facilities

326 IAC 4-2-2 (Incinerators)

The two (2) electric burnout units (Burnout 1 and Burnout 2) are used to melt plastic off machine parts. These units operate at 600 - 800 degrees F. The parts are placed in a sealed chamber that is under a vacuum. The vacuum prevents the plastic from combusting at this temperature, and the plastic melts off the machine parts and runs into a tray underneath the unit. The units do not have an exhaust stack. These units do not meet the definition of an incinerator, because these units do not combust the plastic. Therefore, the requirements of 326 IAC 4-2-2 do not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-2, the particulate emissions from the manufacturing facilities shall be limited as listed in the following table:

Emission Unit ID	Maximum Throughput (lbs/hour)	Allowable Emissions (lbs/hour)	Control Unit ID
Unloading RRUL	33,000	26.8	Screens
Silos S1 – S12			
CoExtruder COEX1	2,800	5.14	none
CoExtruder COEX2	3,000	5.38	
CoExtruder COEX3	2,400	4.63	
CoExtruder COEX4	350	1.28	
CoExtruder COEX5	4,500	7.06	
Coextruder Granulators/Conveyors COEXG1 - COEXG5	1,435	3.28	Bin vent filters
Thermoformer Granulators/Conveyors FG1 - FG10	2,250	4.44	
Slitter/Trimmer/Rewinder SR1	1,000	2.58	
Granulators G1 and G2	7,000	9.49	
Pneumatic Conveyors	13,050	14.4	

This table shows the maximum instantaneous throughput of the emissions units at this source. PTE for the unloading and silos (Appendix A, page 2) is based on annual throughput, which is bottlenecked by the maximum throughput capacity of the co-extruders.

Interpolation of the data for the process weight rate up to sixty thousand (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

Based on the calculations in Appendix A (pages 1 and 2), the coextruder lines (COEX1 - COEX5), the Unloading (RRUL), Silos (S1 – S12), the Coextruder Granulators/ Conveyors (COEXG1 - COEXG5), the Thermoformer Granulators/Conveyors (FG1 - FG10), the Slitter/Trimmer/Rewinder (SR1), the Granulators (G1, G2), and the pneumatic conveyors are able to comply with the limits in 326 IAC 6-3-2.

(b) The printing operations (P8, P9, P10, and P4), thermoformers (F1 through F10), Solvent Parts Tub, Aqueous Parts Tubs 1 and 2, and the electric burnout units (Burnout 1 and Burnout 2) do not emit particulate matter. Therefore, the requirements of 326 IAC 6-3-2 do not apply to these facilities.

326 IAC 8-1-6 (Volatile Organic Compounds)

The potential to emit of VOC from the extruder lines (COEX1 through COEX5), the printers (P4, P8, P9, P10), and the parts cleaning operations (Solvent Parts Tub, Aqueous Parts Tubs 1 and 2) is each less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-3-2 (Cold Cleaner Operations)

The Aqueous Parts tubs are not cold cleaner degreasing facilities and are not used to perform organic solvent degreasing operations. Therefore, the requirements of 326 IAC 8-3-2 do not apply.

326 IAC 8-3-2 (Cold Cleaner Operations)

The cold cleaner degreasing facility (Solvent Parts Tub) is located in Delaware County, was constructed after January 1, 1980 and is used to perform organic solvent degreasing operations. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee of a cold cleaning facility shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

This cold cleaner degreasing facility (Solvent Parts Tub) is located in Delaware County and was constructed prior to July 1, 1990. Therefore, the requirements of 326 IAC 8-3-5 do not apply.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operations)

The Aqueous Parts Tubs 1 and 2 are not cold cleaner degreasing facilities and are not used to perform organic solvent degreasing operations. Therefore, the requirements of 326 IAC 8-3-5 do not apply.

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

The printing operations (P4, P8, P9, and P10) were constructed after January 1, 1980 and the potential to emit VOC from these facilities is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-5-5 do not apply.

326 IAC 8-2-5 (Paper/Plastic Metal Foil Coating Operations)

The printing operations (P4, P8, P9, and P10 apply coatings to plastic and were constructed after July 1, 1990. However, these printers have actual emissions of less than fifteen (15) pounds of VOC per day before add-on controls. Therefore, the requirements of 326 IAC 8-2-5 do not apply.

Compliance Requirements

There are no compliance monitoring requirements applicable to this source. The railcar unloading operation (RRUL) and Silos (S1 – S12) do not use a control device and the actual emissions from these emission units are low. The coextruder lines (COEX1 - COEX5), the Coextruder Granulators/ Conveyors (COEXG1 - COEXG5), the Thermoformer Granulators/Conveyors (FG1 - FG10), the Slitter/Trimmer/Rewinder (SR1), the Granulators (G1, G2), and the pneumatic conveyors utilize control devices, but these emission units have low allowable emissions.

Conclusion

The operation of this plastic sheet and molded plastics manufacturing plant shall be subject to the conditions of this New Source Construction and Minor Source Operating Permit 035-23122-00078.

Appendix A: Emission Calculations
VOC and HAP Emissions From the CoExtrusion Lines

Company Name: Spartech Plastics
Address: 1401 East Memorial Drive, Muncie, Indiana 47302
MSOP: 035-23122-00078
Reviewer: ERG/ST
Date: February 21, 2007

Emissions Unit ID	Material Type	Maximum Throughput Rate (lbs/hour)	VOC Emission Factor (lbs/MMlb)	PM/PM10 Emission Factor (lbs/MMlb)	Ethylbenzene Emission Factor (lbs/MMlb)	Styrene Emission Factor (lbs/MMlb)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	PTE of Ethylbenzene (tons/year)	PTE of Styrene (tons/year)
COEX1	Polypropylene	2,596	653	819	NA	NA	7.42	9.31	0.00	0.00
	EVOH/HDPE	118	30.7	26.6	NA	NA	0.02	0.01	0.00	0.00
	Glue/EVA	87.0	0.8	61.5	NA	NA	0.00	0.02	0.00	0.00
COEX2	Polypropylene	2,781	653	819	NA	NA	7.95	9.98	0.00	0.00
	EVOH/HDPE	126	30.7	26.6	NA	NA	0.02	0.01	0.00	0.00
	Glue/EVA	93.0	0.8	61.5	NA	NA	0.00	0.03	0.00	0.00
COEX3	HIPS	2,089	53.3	NA	6.10	44.3	0.49	0.00	0.06	0.41
	Saran/PVDC	203	59.0	NA	NA	NA	0.05	0.00	0.00	0.00
	Glue/EVA	108	117.2	61.5	NA	NA	0.06	0.03	0.00	0.00
COEX4	Polypropylene	324	653	819	NA	NA	0.93	1.16	0.00	0.00
	EVOH/HDPE	15.0	30.7	26.6	NA	NA	0.00	0.00	0.00	0.00
	Glue/EVA	11.0	0.8	61.5	NA	NA	0.00	0.00	0.00	0.00
COEX5	Polystyrene	3,353	53.3	NA	6.10	44.3	0.78	0.00	0.09	0.65
	EVOH/HDPE	107	30.7	26.6	NA	NA	0.01	0.01	0.00	0.00
	Glue/EVA	194	117.2	61.5	NA	NA	0.10	0.05	0.00	0.00
	LDPE	846	157.4	242	NA	NA	0.58	0.90	0.00	0.00
						Totals	**18.4**	**21.5**	**0.15**	**1.06**

NA - emission factors are not available for these material/pollutant combinations
Emission factors represent emissions before controls. VOC and particulate emissions are uncontrolled
Emission factors for polypropylene are from "Development of Emission Factors for Polypropylene Processing", Journal of Air and Waste Management Association, January 1999.
1996.
Emission factors for Glue/EVA are from "Development of Emission Factors for Ethylene-Vinyl Acetate & Ethylene-Methyl Acrylate Copolymer", Journal of Air and Waste Management Association, October 1997.
Emission factors for HIPS are from "Sampling and Analysis of Fumes Evolved During Thermal Processing of Polystyrene Resins", Dow Chemical, et al.
Emission factors for Saran/PVDC are from "Process Emissions for Vinyl Pipe Industry", Journal of Vinyl and Additive Technology, September 1996.

METHODOLOGY

PTE (tons/year) = Maximum Process Rate (lbs/hour) x Emission Factor (lbs/1,000,000 lb) x 8760 hours/year x 1 ton/2000 lbs

Appendix A: Emission Calculations
Particulate Emissions From Granulator, Silos and Pneumatic Conveyors

Company Name: Spartech Plastics
Address: 1401 East Memorial Drive, Muncie, Indiana 47302
MSOP: 035-23122-00078
Reviewer: ERG/ST
Date: February 21, 2007

Emission Unit (ID#) *(Control Device)*	Combined Maximum Throughput (tons/hour)	PM/PM10 Emission Factor (lbs/ton)	Control Device	Control Efficiency (%)	PTE of PM/PM10 Before Control (lbs/hr)	PTE of PM/PM10 Before Control (tons/year)	PTE of PM/PM10 After Control (tons/year)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
Unloading (RRUL), Silos (S1 - S12), and 3 Conveyors *(Screens)* *	6.53	2.9E-05	Fabric filter	99.9%	1.9E-04	0.829	0.0008	26.8
Coextruder Granulators/Conveyors (COEXG1 -COEXG5) *(Bin Vent Filters)*	0.72	2.9E-05	Fabric filter	99.9%	2.1E-05	0.091	0.0001	3.3
Thermoformer Granulators/Conveyors (FG1 - FG10) *(Bin Vent Filters)*	1.13	2.9E-05	Fabric filter	99.9%	3.3E-05	0.143	0.0001	4.4
Slitter/Trimmer/Rewinder/Conveyor (SR1) *(Bin Vent Filters)*	0.50	2.9E-05	Fabric filter	99.9%	1.5E-05	0.064	0.0001	2.6
Granulators/Conveyors (G1 and G2) *(Bin Vent Filters)*	3.50	2.9E-05	Fabric filter	99.9%	1.0E-04	0.445	0.0004	9.5
Pneumatic Conveyors (Filters)**	6.53	2.9E-05	Fabric filter	99.9%	1.9E-04	0.001	0.0008	14.4
					Totals	**1.57**	**0.0024**	

** These conveyors transport plastic pellets and regrind from the silos, surge bins and gaylord boxes to the coextruders for processing. The capacity is limited to the capacity of the coextruders 6.53 ton/hour. IDEM has determined that the controls are integral to the process. Therefore PTE is calculated with controls.

* The maximum throughput of the unloading systems, silos, and associated conveyors on an annual basis is limited to the capacity of the coextruders (6.53 tons/hour). However, Allowable Emissions under 326 IAC 6-3-2 are based on an instantaneous maximum throughput of 33,000 pounds per hour for these emissions units.

Emission factor for plastic pellets and scrap is from AP 42, Chapter 11.6, Table 11.6-4 "Limestone Transfer with Fabric Filter" (SCC 3-05-006-12)(1/95).

Assume all PM is equal to PM10.

Methodology

PTE of PM/PM10 Controlled (lbs/hour) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hour) x 1/7000 (lb/gr)

PTE of PM/PM10 Controlled (tons/year) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hour) x 8760 (hour/year) x 1/7000 (lb/gr) x 1 ton/2000 lbs

PTE of PM/PM10 Uncontrolled (lbs/hour) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hour) x 1/7000 (lb/gr) x 1/(1-Control Eff. (%))

PTE of PM/PM10 Uncontrolled (tons/year) = PTE of PM/PM10 Controlled (tons/year) x 1/(1-Control Eff. (%))

326 IAC 6-3-2 Allowable Emissions (lbs/hour) = 4.1 x (Process Weight Rate (lbs/hour) x 1 ton/2,000 lbs)^0.67

Appendix A: Emission Calculations
VOC and HAP Emissions From the Printers and Printer Cleaners

Company Name: Spartech Plastics
Address: 1401 East Memorial Drive, Muncie, Indiana 47302
MSOP: 035-23122-00078
Reviewer: ERG/ST
Date: February 21, 2007

Emissions Unit ID	Maximum Process Rate (parts/hour)	Usage Rate (lbs/part)	Weight % VOC	PTE of VOC (tons/year)
Printer P4	25,200	6.8E-07	0.10%	7.50E-05
Printer P8	25,200	6.8E-07	0.10%	7.50E-05
Printer P9	25,200	6.8E-07	0.10%	7.50E-05
Printer P10	25,200	1.4E-06	0.10%	1.50E-04
			Total	**3.75E-04**

Inks are cured with UV light.

METHODOLOGY
PTE of VOC (tons/year) = Maximum Process Rate (parts/hour) x Usage Rate (lbs/part) x Weight % VOC x 8760 hours/year x 1 ton/2000 lbs

Emission unit	Material	Density (lbs/gal)	Weight % VOC	Weight % Ethyl Acetate	Weight % Methyl Alcohol	Weight % Methyl Isobutyl Ketone	Maximum Usage (gal/year)	PTE of VOC (tons/year)	PTE of Ethyl Acetate (tons/year)	PTE of Methyl Alcohol (tons/year)	PTE of Methyl Isobutyl Ketone (tons/year)
Ink Roll Cleaner	Ethyl Acetate	7.51	100%	100%	0%	0%	220	0.83	0.83	0.00	0.00
	Denatured Ethyl Alcohol	8.34	100%	0%	3%	2%	50	0.21	0.00	0.007	0.004

METHODOLOGY
PTE of VOC/HAP (tons/year) = Density (lbs/gal) x Weight % VOC/HAP x Maximum Usage (gal/year) x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and HAP Emissions From Parts Cleaners

Company Name: Spartech Plastics
Address: 1401 East Memorial Drive, Muncie, Indiana 47302
MSOP: 035-23122-00078
Reviewer: ERG/ST
Date: February 21, 2007

Emission unit	Material	Density (lbs/gal)	Weight % VOC	Weight % 1,2,4-Trimethylbenzene	Maximum Usage (gal/year)	PTE of VOC (tons/year)	PTE of 1,2,4-Trimethylbenzene (tons/year)
Solvent Part Tub	Crystal Clean 100	6.59	100%	5%	120	0.40	0.02
Aqueous Part Tub 1	MiraChem 500	8.32	8.05%	0%	360	0.12	0.00
Aqueous Part Tub 2*	Ozzy Juice 8W-3	8.49	4.17%	0%	100	0.02	0.00
					Totals	**0.53**	**0.02**

METHODOLOGY
PTE of VOC/HAP (tons/year) = Density (lbs/gal) x Weight % VOC/HAP x Maximum Usage (gal/year) x 1 ton/2000 lbs

*New parts cleaner

Appendix A: Emission Calculations
Emissions for Natural Gas Combustion

Company Name: Spartech Plastics
Address: 1401 East Memorial Drive, Muncie, Indiana 47302
MSOP: 035-23122-00078
Reviewer: ERG/ST
Date: February 21, 2007

Emission Unit Description	Heat Input Capacity (MMBtu/hour)	Maximum Potential Throughput (MMCF/year)
Natural Gas-Fired Heater	12.6	108
Natural Gas-Fired Printer Heaters	0.31	2.68
Natural Gas-Fired HVAC Units	0.70	5.97

Pollutant Emission Factors (lbs/MMCF)						
PM*	PM10*	SO_2	NOx**	CO	VOC	HAPs
1.9	7.6	0.6	100	84.0	5.5	1.89

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO_2	NOx	CO	VOC	HAPs
Natural Gas-Fired Heater	0.10	0.41	0.03	5.40	4.53	0.30	0.10
Natural Gas-Fired Printer Heaters	0.003	0.01	0.001	0.13	0.11	0.01	0.003
Natural Gas-Fired HVAC Units	0.01	0.02	0.002	0.30	0.25	0.02	0.006
TOTALS	**0.11**	**0.44**	**0.03**	**5.83**	**4.90**	**0.32**	**0.11**

* PM emission factor is for filterable PM only. PM10 emission factor is for filterable and condensable PM and PM10 combined.
**Emission factors for NOx: Uncontrolled = 100 lb/MMCF
Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

Methodology
Max. Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x 1 MMCF/1,020 MMBtu
PTE (tons/year) = Max. Potential Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
One (1) Fire Pump Engine - Diesel Fuel

Company Name: Spartech Plastics
Address: 1401 East Memorial Drive, Muncie, Indiana 47302
MSOP: 035-23122-00078
Reviewer: ERG/ST
Date: February 21, 2007

Emission Unit ID	Maximum Heat Input Capacity Horsepower (hp)	Maximum Potential Throughput (all) hp-hours/year
Pump1	208	104,000

Emission Unit ID	Pollutant Emission Factor (lbs/hp-hour)						
	PM*	PM10*	SO_2	NOx	VOC	CO	Total HAPs
Pump1	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067	4.52E-05

Emission Unit ID	Potential to Emit (tons/year)						
	PM*	PM10*	SO_2	NOx	VOC	CO	Total HAPs
Pump1	0.11	0.11	0.11	1.6	0.13	0.35	0.00

Emission factors are from AP 42 Table 3.3-1 (SCC 2-02-001-02, 2-03-001-01) [10/96]
* Assume PM = PM10
PTE for the emergency fire pump engine is calculated on the basis of 500 hours of operation per year, per U.S. EPA guidance (2/20/07).

Methodology
Maximum Potential Througput (hp-hours/year) = Heat Input Capacity (hp) x 500 hours/year
Potential to Emit (tons/year) = Maximum Potential Throughput (hp-hours/year) x Emission Factor (lbs/hp-hour) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Fugitive Emissions From Paved Roads

Company Name: Spartech Plastics
Address: 1401 East Memorial Drive, Muncie, Indiana 47302
MSOP: 035-23122-00078
Reviewer: ERG/ST
Date: February 21, 2007

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = (k \times (sL/2)^a \times (w/3)^b - C) \times (1 - p/(4 \times 365))$$

where:

E =	emission factor (lb/vehicle mile traveled)	
sL =	road surface silt loading (g/m^2) =	7.4 (g/m^2) *
w =	mean vehicle weight (tons) =	5.88 tons *
k =	empirical constant =	0.082 for PM and 0.016 for PM10
a =	empirical constant =	0.65
b =	empirical constant =	1.5
C =	emission factor for exhaust, brake and tire wear	0.00047 for PM and PM10
p =	number of days per year with 0.01 inches precipitati	120

PM Emission Factor = $(0.082 \times (7.4/2)^{0.65} \times (24.2/3)^{1.5} - 0.00047) \times (1 - 120/1460)$ = **0.48** lbs/mile

PM10 Emission Factor = $(0.016 \times (7.4/2)^{0.65} \times (24.2/3)^{1.5} - 0.00047) \times (1 - 120/1460)$ = **0.09** lbs/mile

Length of Paved Roads in One Direction = **0.10** miles

2. Potential to Emit (PTE) of PM/PM10 Before Control from Paved Roads:

Vehicle Type	Vehicles per day	Average Vehicle Weight (tons)	Total Trip Number (trips/yr)	Traffic Component (%)	Component Vehicle Weight (tons)	Vehicle Mile Traveled (VMT) (miles/yr)	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)
Semi Trailer	4	35	1,460	11.76%	4.12	292	0.1	0.01
Private Vehicle	30	2	10,950	88.24%	1.76	2,190	0.53	0.10
Total	**34**			**100%**	**5.9**	**2482**	**0.6**	**0.12**

* This information is provided by the source.

Methodology
Average Vehicle Weight (ton) = (Weight of Unloaded Vehicles + Weight of Loaded Vehicles) / 2
Total Trip Number (trips/yr) = Trucks per day x 365 (days/yr)
Component Vehicle Weight = Avg. Vehicle Weight (tons) x Traffic Component (%)
(Note that the summation of the component vehicle weight equals the Mean Vehicle Weight.)
VMT(miles/yr) = Length of Paved Roads in One Direction (miles) x 2 x Total Trip Numbers (trips/yr)
PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x Emission Factors (lbs/mile) x 1 tons/ 2000 lbs

Appendix A: Emission Calculations
Summary

Company Name: Spartech Plastics
Address: 1401 East Memorial Drive, Muncie, Indiana 47302
MSOP: 035-23122-00078
Reviewer: ERG/ST
Date: February 21, 2007

	Before Modification - Potential to Emit Before Controls (tons/year)						
Emission Unit	**PM**	**PM10**	**SO_2**	**NOx**	**CO**	**VOC**	**HAPs**
Coextruders COEX1 - COEX5	20.4	20.4	0.0	0.0	0.0	17.5	1.2
Granulator, Silos, Conveyors	1.57	1.57	0.0	0.0	0.0	0.0	0.0
Printers P4, P8, P9, P10	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Ink Roll Cleaner	0.0	0.0	0.0	0.0	0.0	1.0	0.8
Parts Cleaners	0.0	0.0	0.0	0.0	0.0	0.5	0.0
Natural Gas Combustion	0.11	0.44	0.0	5.83	4.90	0.32	0.11
Fire Pump Engine	0.11	0.11	0.11	1.61	0.35	0.13	0.002
Paved Roads	0.6	0.1	0.0	0.0	0.0	0.0	0.0
Totals	**22.8**	**22.6**	**0.14**	**7.44**	**5.24**	**19.5**	**2.17**

	After Modification - Potential to Emit Before Controls (tons/year)						
Emission Unit	**PM**	**PM10**	**SO_2**	**NOx**	**CO**	**VOC**	**HAPs**
Coextruders COEX1 - COEX5	21.5	21.5	0.0	0.0	0.0	18.4	1.20
Granulator, Silos, Conveyors	1.57	1.57	0.0	0.0	0.0	0.0	0.0
Printers P4, P8, P9, P10	0.0	0.0	0.0	0.0	0.0	3.8E-04	0.0
Ink Roll Cleaner	0.0	0.0	0.0	0.0	0.0	1.03	0.84
Parts Cleaners	0.0	0.0	0.0	0.0	0.0	0.53	0.02
Natural Gas Combustion	0.11	0.44	0.03	5.83	4.90	0.32	0.11
Fire Pump Engine	0.11	0.11	0.11	1.61	0.35	0.13	0.002
Paved Roads	0.60	0.10	0.0	0.0	0.0	0.0	0.0
Totals	**23.9**	**23.8**	**0.14**	**7.44**	**5.24**	**20.4**	**2.17**

What if you are not satisfied with this decision and you want to file an appeal?

Who may file an appeal?
The decision described in the accompanying Notice of Decision may be administratively appealed. Filing an appeal is formally known as filing a "Petition for Administrative Review" to request an "administrative hearing."

If you object to this decision issued by the Indiana Department of Environmental Management (IDEM) and are: 1) the person to whom the decision was directed, 2) a party specified by law as being eligible to appeal, or 3) aggrieved or adversely affected by the decision, you are entitled to file an appeal. (An aggrieved or adversely affected person is one who would be considered by the court to be negatively impacted by the decision. If you file an appeal because you feel that you are aggrieved, it will be up to you to demonstrate in your appeal how you are directly impacted in a negative way by the decision).

The Indiana Office of Environmental Adjudication (OEA) was established by state law – see Indiana Code (IC) 4-21.5-7 – and is a separate state agency independent of IDEM. The jurisdiction of the OEA is limited to the review of environmental pollution concerns or any alleged technical or legal deficiencies associated with the IDEM decision making process. Once your request has been received by OEA, your appeal may be considered by an Environmental Law Judge.

What is required of persons filing an appeal?
Filing an appeal is a legal proceeding, so it is suggested that you consult with an attorney. Your request for an appeal must include your name and address and identify your interest in the decision (Or, if you are representing someone else, his or her name and address and their interest in the decision). In addition, please include a photocopy of the accompanying Notice of Decision or list the permit number and name of the applicant, or responsible party, in your letter.

Before a hearing is granted, you must identify the reason for the appeal request and the issues proposed for consideration at the hearing. You also must identify the permit terms and conditions that, in your judgment, would appropriately satisfy the requirements of law with respect to the IDEM decision being appealed. That is, you must suggest an alternative to the language in the permit (or other order, or decision) being appealed, and your suggested changes must be consistent with all applicable laws (See Indiana Code 13-15-6-2) and rules (See Title 315 of the Indiana Administrative Code, or 315 IAC).

The effective date of this agency action is stated on the accompanying Notice of Decision (or other IDEM decision notice). If you file a "Petition for Administrative Review" (appeal), you may wish to specifically request that the action be "stayed" (temporarily halted) because most appeals do not allow for an automatic "stay." If, after an evidentiary hearing, a "stay" is granted, the IDEM-approved action may be halted altogether, or only allowed to continue in part, until a final decision has been made regarding the appeal. However, if the action is not "stayed" the IDEM-approved activity will be allowed to continue during the appeal process.

(See reverse side)

Where can you file an appeal?
If you wish to file an appeal, you must do so in writing. There are no standard forms to fill out and submit, so you must state your case in a letter (called a petition for administrative review) to the Indiana Office of Environmental Adjudication (OEA). Do not send the original copy of your appeal request to IDEM. Instead, send or deliver your letter to:

The Indiana Office of Environmental Adjudication
100 North Senate Ave.
Indiana Government Center North
Room 1049
Indianapolis, IN 46204

If you file an appeal, also please send a copy of your appeal letter to the IDEM contact person identified in the Notice of Decision, and to the applicant (person receiving an IDEM permit, or other approval).

Your appeal (petition for administrative review) must be received by the Office of Environmental Adjudication in a timely manner. Different types of permit approvals have different deadlines for filing an appeal. The accompanying Notice of Decision (NOD) explains how to determine the due date for filing an appeal for this particular permit decision. To ensure that you meet this filing requirement, your appeal request must be:

1) Delivered in person to the OEA by the close-of-business on the due date. (If the due date falls on a day when the Office of Environmental Adjudication (OEA) is closed for the weekend or for a state holiday, then your petition will be accepted on the next business day on which OEA is open.); or
2) Given to a private carrier who will deliver it to the OEA on your behalf, (and from whom you must obtain a receipt dated on or before the due date); or
3) For those appeal requests sent by U.S. Mail, your letter must be postmarked by no later than midnight of the due date; or
4) Faxed to the OEA at 317/233-9372 before the close-of-business of the due date, provided that the original signed "Petition for Administrative Review" is also sent, or delivered, to the OEA in a timely manner.

What are the costs associated with filing an appeal?
The OEA does not charge a fee for filing documents for an administrative review or for the use of its hearing facilities. However, OEA does charge a fifteen cent ($.15) per page fee for copies of any documents you may request. Another cost that could be associated with your appeal would be for attorney's fees. Although you have the option to act as your own attorney, the administrative review and associated hearing are complex legal proceedings; therefore, you should consider whether your interests would be better represented by an experienced attorney.

What can you expect from the Office of Environmental Adjudication (OEA) after you file for an appeal?
The OEA will provide you with notice of any prehearing conferences, preliminary hearings, hearings, "stays," or orders disposing of the review of this decision. In addition, you may contact the OEA by phone at 317/232-8591 with any scheduling questions. However, technical questions should be directed to IDEM at the number indicated on the Notice of Decision.

Do not expect to discuss details of your case with the OEA other than in a formal setting such as a prehearing conference, a formal hearing, or a settlement conference. The OEA is not allowed to discuss a case without all sides being present. All parties to the proceeding are expected to appear at the initial prehearing conference.