



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: March 19, 2008
RE: Louisiana Pacific Corporation / 039-23280-00035
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Louisiana Pacific Corporation
219 U.S. Highway 20 West
Middlebury, Indiana 46540**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

| | |
|--|--|
| Operation Permit No.: F039-23280-00035 | |
| Issued by: <i>Original document signed by</i> Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality | Issuance Date: March 19, 2008 Expiration Date: March 19, 2018 |

TABLE OF CONTENTS

| | |
|---|-----------|
| A. SOURCE SUMMARY..... | 4 |
| A.1 General Information [326 IAC 2-8-3(b)] | |
| A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)] | |
| A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)] | |
| A.4 FESOP Applicability [326 IAC 2-8-2] | |
| B. GENERAL CONDITIONS | 7 |
| B.1 Definitions [326 IAC 2-8-1] | |
| B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)] | |
| B.3 Term of Conditions [326 IAC 2-1.1-9.5] | |
| B.4 Enforceability [326 IAC 2-8-6] | |
| B.5 Severability [326 IAC 2-8-4(4)] | |
| B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)] | |
| B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)] | |
| B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)] | |
| B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)] | |
| B.10 Compliance Order Issuance [326 IAC 2-8-5(b)] | |
| B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)] | |
| B.12 Emergency Provisions [326 IAC 2-8-12] | |
| B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] | |
| B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)] | |
| B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)] | |
| B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8] | |
| B.17 Permit Renewal [326 IAC 2-8-3(h)] | |
| B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1] | |
| B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1] | |
| B.20 Source Modification Requirement [326 IAC 2-8-11.1] | |
| B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1] | |
| B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10] | |
| B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7] | |
| B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6] | |
| C. SOURCE OPERATION CONDITIONS | 16 |
| Emission Limitations and Standards [326 IAC 2-8-4(1)] | |
| C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2] | |
| C.2 Overall Source Limit [326 IAC 2-8] | |
| C.3 Opacity [326 IAC 5-1] | |
| C.4 Open Burning [326 IAC 4-1] [IC 13-17-9] | |
| C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2] | |
| C.6 Fugitive Dust Emissions [326 IAC 6-4] | |
| C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M] | |
| Testing Requirements [326 IAC 2-8-4(3)] | |
| C.8 Performance Testing [326 IAC 3-6] | |

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

D.1.2 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds and Hazardous Air Pollutants [326 IAC 8-1-2] [326 IAC 8-1-4]

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

D.1.4 Record Keeping Requirements

D.1.5 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS..... 25

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

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

D.3 FACILITY OPERATION CONDITIONS..... 26

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

D.3.1 Particulate Emissions [326 IAC 6-3]

Certification Form..... 27

Emergency Occurrence Form..... 28

Quarterly Usage Form..... 30

Quarterly Deviation and Compliance Monitoring Report Form..... 31

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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary plastic mouldings manufacturing plant.

| | |
|------------------------------|---|
| Source Address: | 219 U.S. Highway 20 West, Middlebury, Indiana 46540 |
| Mailing Address: | P.O. Box 509, Middlebury, Indiana 46540 |
| General Source Phone Number: | 574-825-6548 |
| SIC Code: | 3089 |
| County Location: | Elkhart |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories |

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

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

PVC and Polystyrene finishing areas consisting of the following:

- (a) Five (5) PVC/Polystyrene flow coat/curtain coat stations, identified as EU-01, constructed in 1976, with a maximum coating usage of 5.0 gallons per hour per station;
- (b) Eleven (11) Polystyrene extrusion lines including two wipe coat stations each, identified as EU-02, constructed in 1978, with a maximum coating usage of 2.0 gallons per hour per line; and
- (c) Four (4) PVC/Polystyrene roll coat finishing stations, identified as EU-03, constructed in 1964, with a maximum coating usage of 5.0 gallons per hour per station applied to plastic.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Polystyrene additives mixing process, with emissions controlled by a baghouse, and exhausting outside the building;
- (b) PVC powder mixing process, with emissions controlled by a baghouse, and exhausting inside the building;
- (c) One (1) Polystyrene extrusion area with a maximum potential throughput rate of 4,100 pounds per hour and one (1) PVC extrusion area, with a maximum potential throughput rate of 200 pounds per hour;
- (d) One (1) Beringer Jet cleaner, constructed in 2001, with a maximum polystyrene charge of 2,000 grams, and a cleaning cycle of 90 minutes;

- (e) Two (2) storage tanks with maximum capacities of 5,000 gallons and 6,000 gallons, used for storing solvent and spent solvent, having maximum tank losses of 0.28 pound of VOC per hour;
- (f) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (g) A stationary diesel-fired fire pump with a maximum output of 325 horsepower (hp);
- (h) A laboratory as defined in 326 IAC 2-7(20)(c);
- (i) Research and development activities as defined in 326 IAC 2-7-1(21)(D);
- (j) Closed loop heating and cooling systems;
- (k) Noncontact cooling tower systems with either of the following:
 - (1) Natural draft cooling towers not regulated under NESHAP;
 - (2) Forced and induced draft cooling tower system not regulated under a NESHAP;
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (m) Paved and unpaved roads and parking lots with public access;
- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (o) Natural gas-fired space heaters, with heat input equal to or less than ten million (10,000,000) British thermal units per hour each, with a total maximum heat input capacity of 35 MMBtu per hour;
- (p) Heat exchanger cleaning and repair;
- (q) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. The trimmers are used to trim finished moulding to length;
- (r) Routine maintenance and repair of buildings, structures or vehicles where air emissions from those activities would not be associated with any production process;
- (s) On-site fire training; and
- (t) Filter or coalescer media changeout.
- (u) One (1) polystyrene regrind extruder with one (1) pelletizer and a maximum throughput capacity of 200 pounds per hour.
- (v) One (1) pneumatic conveyance system used to transport polystyrene pellets from the regrind extruder and pelletizer to a storage silo.
- (w) One (1) scrap PVC grinder with a cyclone for particulate control and a maximum throughput capacity of 200 pounds per hour.

- (x) One (1) scrap polystyrene grinder with a maximum throughput capacity of 1,000 pounds per hour with emissions controlled by a baghouse.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)][326 IAC 25-2-2]

- (a) This permit, F039-23280-00035, is issued for a fixed term of ten (10) 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.3 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.4 Enforceability [326 IAC 2-8-6]

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.5 Severability [326 IAC 2-8-4(4)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (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(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.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (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.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At the minimum, the PMPs shall include:
- (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.
- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F039-23280-00035 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 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). 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
MC 61-53 IGCN 1003
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 2-8 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.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][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 FESOP 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 the conditions of this permit;
- (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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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

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

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

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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(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.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) 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
MC 61-53 IGCN 1003
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 an "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 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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision 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.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 facility 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 retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) 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.
- (d) 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).
- (e) 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.
- (f) If the Permittee is a member of IDEM's Environmental Stewardship Program (ESP), the Permittee may report in the manner below for any reporting requirement except Section B - Deviations from Permit Requirements, that allows reporting per this paragraph:
 - (1) Each report shall be submitted semi-annually, covering the period from April 1 to September 30 or October 1 to March 31.
 - (2) Each report, 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.
 - (3) Each report 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).
 - (4) The Permittee shall use the attached Environmental Stewardship Program Reporting Forms or their equivalent.
 - (5) Each report shall be submitted to the address listed in paragraph (b) of this condition.

If the Permittee is removed from or withdraws from the ESP, the Permittee shall begin quarterly reporting according to paragraphs (a) through (e) of this condition and the condition(s) requiring the reporting. If the Permittee is removed from or withdraws from the ESP during the second quarter of a semi-annual period, the Permittee shall submit all reports for the first quarter of the period within thirty (30) days of the removal or withdrawal.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

PVC and Polystyrene finishing areas consisting of the following:

- (a) Five (5) PVC/Polystyrene flow coat/curtain coat stations, identified as EU-01, constructed in 1976, with a maximum coating usage of 5.0 gallons per hour per station;
- (b) Eleven (11) Polystyrene extrusion lines including two wipe coat stations each, identified as EU-02, constructed in 1978, with a maximum coating usage of 2.0 gallons per hour per line; and
- (c) Four (4) PVC/Polystyrene roll coat finishing stations, identified as EU-03, constructed in 1964, with a maximum coating usage of 5.0 gallons per hour per station applied to plastic.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8, the total VOC input to the surface coating lines EU-01, EU-02, and EU-03 plus the amount of VOC used for cleanup shall be limited to less than 94.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. If the VOC emissions calculated for EU-01, EU-02, and EU-03, plus the amount of VOC used for cleanup is less than 50% of permitted limits for six consecutive months, the Permittee may calculate the monthly emissions at the end of each quarter. Fiscal month inventories may be used to demonstrate compliance as long as the fiscal month end is not more than five (5) days different than the calendar month end. Compliance with this limit will limit source-wide emissions of VOC to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

An annual compliance certification, in accordance with Section B – Annual Compliance Certification, is required to be submitted by the Permittee.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds and Hazardous Air Pollutants [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.

- (1) The VOC content of each coating material and solvent used.

- (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC usage for each month.
 - (5) The total VOC usage for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

- (a) Pursuant to 326 IAC 25, if the Permittee is a member of IDEM's Environmental Stewardship Program (ESP), the Permittee shall submit at a minimum a semi-annual summary of the information to document compliance with Condition D.1.1 to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Alternatively, the source may submit quarterly summaries of the information to document compliance with Condition D.1.1 to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) If the Permittee is not a member of IDEM's Environmental Stewardship Program (ESP), the Permittee shall submit quarterly summaries of the information to document compliance with Condition D.1.1 to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description: Insignificant Activities

- (a) Polystyrene additives mixing process, with emissions controlled by a baghouse, and exhausting outside the building;
- (b) PVC powder mixing process, with emissions controlled by a baghouse, and exhausting inside the building;

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

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

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

Pursuant to 326 IAC 6-3-2(e)(2), when operating at a process weight rate that is less than one hundred (100) pounds per hour, the allowable rate of particulate emission from the PVC and Polystyrene additives mixing operations is five hundred fifty-one thousandths (0.551) pound per hour.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description: Insignificant Activities

- (x) One (1) scrap polystyrene grinder with a maximum throughput capacity of 1,000 pounds per hour with emissions controlled by a baghouse.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]**D.3.1 Particulate Emissions [326 IAC 6-3]**

Pursuant to 326 IAC 6-3-2, when operating at a process weight rate of 1,000 pounds per hour, the allowable rate of particulate emission from the polystyrene grinder is 2.58 pounds per hour. The pound per hour limitation was calculated with the following equation:

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Louisiana Pacific Corporation
Source Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
Mailing Address: P.O. Box 509, Middlebury, Indiana 46540
FESOP Permit No.: F039-23280-00035

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Louisiana Pacific Corporation
Source Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
Mailing Address: P.O. Box 509, Middlebury, Indiana 46540
FESOP Permit No.: F039-23280-00035

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

FESOP Usage Report

(submit report quarterly or semi-annually)

Source Name: Louisiana Pacific Corporation
 Source Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
 Mailing Address: P.O. Box 509, Middlebury, Indiana 46540
 FESOP Permit No.: F039-23280-00035
 Facility: Surface Coating Stations EU-01, EU-02, and EU-03
 Parameter: VOC Input
 Limit: The total VOC input to the surface coating stations EU-01, EU-02, and EU-03 plus the amount used for cleanup shall be limited to less than 94.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. If the VOC emissions calculated for EU-01, EU-02, and EU-03, plus the amount of VOC used for cleanup is less than 50% of permitted limits for six consecutive months, the Permittee may calculate the monthly emissions at the end of each quarter. Fiscal month inventories may be used to demonstrate compliance as long as the fiscal month end is not more than five (5) days different than the calendar month end.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Louisiana Pacific Corporation
 Source Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
 Mailing Address: P.O. Box 509, Middlebury, Indiana 46540
 FESOP Permit No.: F039-23280-00035

Months: _____ to _____ Year: _____

Page 1 of 2

| | |
|--|-------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ΔNo deviations occurred this reporting period@.</p> | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

| | |
|--|-------------------------------|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit
(FESOP) Renewal

Source Background and Description

| | |
|---------------------------------|---|
| Source Name: | Louisiana Pacific Corporation |
| Source Location: | 219 U.S. Highway 20 West, Middlebury, Indiana 46540 |
| County: | Elkhart |
| SIC Code: | 3089 |
| Operation Permit No.: | F039-14034-00035 |
| Operation Permit Issuance Date: | April 2, 2002 |
| Permit Renewal No.: | F039-23280-00035 |
| Permit Reviewer: | ERG/SE |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Louisiana Pacific Corporation relating to the operation of a plastic mouldings manufacturing plant.

History

On June 27, 2006, Louisiana Pacific Corporation submitted an application to the OAQ requesting the renewal of its operating permit. Louisiana Pacific Corporation was issued its first FESOP Renewal (F039-14034-00035) on April 2, 2002. This plant is a member of Indiana Environmental Stewardship Program, which rewards facilities that voluntarily exceed regulatory requirements, implement systems for improving environmental management, work with their communities and set goals for improvements in environmental performance. Only facilities with a record of sustained compliance with environmental requirements are eligible to participate in this program.

Permitted Emission Units and Pollution Control Equipment

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

PVC and Polystyrene finishing areas consisting of the following:

- (a) Five (5) PVC/Polystyrene flow coat/curtain coat stations, identified as EU-01, constructed in 1976, with a maximum coating usage of 5.0 gallons per hour per station;
- (b) Eleven (11) Polystyrene extrusion lines including two wipe coat stations each, identified as EU-02, constructed in 1978, with a maximum coating usage of 2.0 gallons per hour per line; and
- (c) Four (4) PVC/Polystyrene roll coat finishing stations, identified as EU-03, constructed in 1964, with a maximum coating usage of 5.0 gallons per hour per station applied to plastic.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted emission units operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

The following emission units were removed from the source prior to 2006:

- (a) One (1) PVC laminator area, identified as EU-04, constructed in 1975, utilizing a solvent base adhesive, with a maximum coating usage of 1.0 gallons per hour;
- (b) A PVC laminating area utilizing a water base adhesive with a potential to emit 0.0007 pounds of VOC per hour;
- (c) Propane or liquified petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour; and

Insignificant Activities

- (a) Polystyrene additives mixing process, with emissions controlled by a baghouse, and exhausting outside the building;
- (b) PVC powder mixing process, with emissions controlled by a baghouse, and exhausting inside the building;
- (c) One (1) Polystyrene extrusion area with a maximum potential throughput rate of 4,100 pounds per hour and one (1) PVC extrusion area, with a maximum potential throughput rate of 200 pounds per hour;
- (d) One (1) Beringer Jet cleaner, constructed in 2001, with a maximum polystyrene charge of 2,000 grams, and a cleaning cycle of 90 minutes;
- (e) Two (2) storage tanks with maximum capacities of 5,000 gallons and 6,000 gallons, used for storing solvent and spent solvent, having maximum tank losses of 0.28 pound of VOC per hour;
- (f) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (g) A stationary diesel-fired fire pump with a maximum output of 325 horsepower (hp);
- (h) A laboratory as defined in 326 IAC 2-7(21)(D);
- (i) Research and development activities as defined in 326 IAC 2-7-1(21)(E);
- (j) Closed loop heating and cooling systems;
- (k) Noncontact cooling tower systems with either of the following:
 - (1) Natural draft cooling towers not regulated under NESHAP;
 - (2) Forced and induced draft cooling tower system not regulated under a NESHAP;
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (m) Paved and unpaved roads and parking lots with public access;
- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

- (o) Natural gas-fired space heaters, with heat input equal to or less than ten million (10,000,000) British thermal units per hour each, with a total maximum heat input capacity of 35 MMBtu per hour;
- (p) Heat exchanger cleaning and repair;
- (q) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. The trimmers are used to trim finished moulding to length;
- (r) Routine maintenance and repair of buildings, structures or vehicles where air emissions from those activities would not be associated with any production process;
- (s) On-site fire training; and
- (t) Filter or coalescer media changeout.
- (u) One (1) polystyrene regrind extruder with one (1) pelletizer and a maximum throughput capacity of 200 pounds per hour.
- (v) One (1) pneumatic conveyance system used to transport polystyrene pellets from the regrind extruder and pelletizer to a storage silo.
- (w) One (1) scrap PVC grinder with a cyclone for particulate control and a maximum throughput capacity of 200 pounds per hour.
- (x) One (1) scrap polystyrene grinder with a maximum throughput capacity of 1,000 pounds per hour with emissions controlled by a baghouse.

Existing Approvals

Since the issuance of the FESOP 039-14034-00035 on April 2, 2002, with an expiration date of April 2, 2007, the source has constructed or has been operating under the following additional approval:

Administrative Amendment 039-18730-00035, issued on June 29, 2004

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

FESOP limits

The VOC FESOP limit contained in FESOP 039-14034-00035 has been revised in order to allow for the worst case emissions of all of the insignificant emission units. FESOP 039-14034-00035 contained a HAP limit pursuant to 326 IAC 2-8 for the surface coating units EU-01 through EU-03. The HAP emissions from the surface coating lines were previously calculated to be greater than 10 tons per year for a single HAP and greater than 25 tons per year for a combination of HAPs. The only single HAP that was previously calculated to have the potential to emit greater than 10 tons per year was methyl ethyl ketone (MEK). In the Federal Register (FR 75047) dated December 19, 2005, the EPA removed MEK from the list of hazardous air pollutants. Without MEK, the potential to emit of any single HAP from this source is less than 10 tons per year and the potential to emit of a combination of HAPs is less than 25 tons per year. The revised

calculations submitted by the source during the review of the application for this FESOP renewal confirm that the potential to emit any single HAP is less than 10 tons per year and the potential to emit of a combination of HAPs is less than 25 tons per year. Therefore, a HAP limit pursuant to 326 IAC 2-8 is no longer required.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 7).

County Attainment Status

The source is located in Elkhart County.

| Pollutant | Status |
|-----------------|------------|
| PM10 | Attainment |
| PM2.5 | Attainment |
| SO ₂ | Attainment |
| NOx | Attainment |
| 8-hour Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 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 ozone standards. Elkhart County has been designated as attainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2. See the State Rule Applicability - Entire Source section.
- (c) Elkhart 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.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

| Pollutant | tons/year |
|-----------------|-----------|
| PM | 18.1 |
| PM10 | 16.5 |
| SO ₂ | 0.42 |
| VOC | 258 |
| CO | 13.1 |
| NOx | 17.0 |
| Total HAPs | 5.57 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit its VOC emissions to less than Title V levels; therefore, the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, SO₂, CO and NOx is less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | Not Reported |
| PM10 | Not Reported |
| SO ₂ | Not Reported |
| VOC | 23.7 |
| CO | Not Reported |
| NOx | Not Reported |
| HAP | 2.0 |

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/emission unit | Potential To Emit (tons/year) | | | | | | |
|---------------------------------------|-------------------------------|------------|-----------------|------|------|-----------------|----------|
| | PM | PM10 | SO ₂ | VOC | CO | NO _x | HAPs |
| EU-01 through EU-03 | - | - | - | 94.0 | - | - | 2.34 |
| Mixing | 9.13 | 9.13 | -- | -- | -- | -- | -- |
| Extrusion | -- | -- | -- | 1.05 | -- | -- | 9.41E-01 |
| Trimmers | Negligible | Negligible | -- | -- | -- | -- | -- |
| Beringer Jet Cleaner | 5.00 | 4.56 | -- | 2.74 | -- | -- | 2.00 |
| Tank Losses | -- | -- | -- | 1.23 | -- | -- | -- |
| Fire Pump | 0.06 | 0.06 | 0.33 | 0.06 | 0.45 | 1.95 | 3.08E-04 |
| Natural Gas Combustion | 0.29 | 1.14 | 0.09 | 0.83 | 12.6 | 15.0 | 0.28 |
| Grinders, Pelletizer, Pellet Handling | 3.59 | 1.63 | -- | -- | -- | -- | -- |
| Total Emissions | 18.1 | 16.5 | 0.42 | 99.9 | 13.1 | 17.0 | 5.57 |

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) The requirements of 40 CFR 60, Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978) are not included in this permit for this source because each storage tank has a storage capacity that is less than 40,000 gallons.
- (b) The requirements of 40 CFR 60, Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984) are not included in this permit for this source because each storage tank has a storage capacity that is less than 40,000 gallons.
- (c) The requirements of 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984) are not included in this permit for this source because each storage tank has a storage capacity that is less than 75 cubic meters.
- (d) The requirements of 40 CFR Part 60, Subpart DDD (Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry) are not included in this permit for this source because Louisiana Pacific Corporation does not manufacture the plastic used at this plant. They purchase the manufactured plastic and extrude it into wood simulated products such as moulding, trim, and baseboards.
- (e) The requirements of 40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) are not included in this permit for this source because the model year of the fire pump is earlier than 2008, the source commenced construction prior to July 11, 2005, and the fire pump was not reconstructed or modified after July 11, 2005.

- (f) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (g) The requirements of 40 CFR Part 63, Subpart JJJ (National Emission Standards for Hazardous Air Pollutant Emission: Group IV Polymers and Resins) do not apply to this source because Louisiana Pacific Corporation does not manufacture thermoplastics. They purchase the thermoplastics and extrude it into wood simulated products such as moulding, trim, and baseboards.
- (h) The requirements of 40 CFR 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) are not included in this permit for this source because this source is not a major source of HAPs.
- (i) The requirements of 40 CFR 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production) are not included in this permit for this source because this source is not a major source of HAPs and does not manufacture reinforced plastic composites.
- (j) The requirements of 40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) are not included in this permit for this source because this source is not a major source of HAPs.
- (k) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was initially constructed in Elkhart County in 1964 and was modified in 1976 and 1978. This source is not in 1 of 28 listed source categories. After unit EU-02 was added in 1978 for polystyrene production, the potential to emit VOC from the entire source exceeded 250 tons per year. The potential to emit of all other regulated pollutants are less than 250 tons per year. Since that time there have been no modifications which resulted in a significant increase in emissions of any regulated pollutant. The source has accepted a VOC limit of less than 100 tons per year, which makes the source minor under PSD rules (see the discussion of FESOP limits below). Therefore, the requirements of 326 IAC 2-2 are not applicable.

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

All units at this source were constructed prior to July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County, is not required to operate under a Part 70 permit, and has potential lead emissions less than 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 326 IAC 2-6-5.

326 IAC 2-8 (FESOP)

Pursuant to 326 IAC 2-8, the total VOC input to the surface coating lines EU-01, EU-02, and EU-03 plus the amount of VOC used for cleanup shall be limited to less than 94.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. If the VOC emissions calculated for EU-01, EU-02, and EU-03, plus the amount of VOC used for cleanup is less than 50% of permitted limits for six consecutive months, the Permittee may calculate the monthly emissions at the end of each quarter. Fiscal month inventories may be used to demonstrate compliance as long as the fiscal month end is not more than five (5) days different than the calendar month end. Compliance with this limit will limit source-wide emissions of VOC

to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

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 Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-off-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

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

This source is not a source of fugitive particulate matter emissions. Therefore, the requirements of 326 IAC 6-5 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Since this source was initially constructed prior to October 7, 1974 and is located in Elkhart County, it is not subject to the requirements of 326 IAC 8-6.

State Rule Applicability – PVC and Polystyrene Surface Coating Lines

326 IAC 6-3 (Particulate Emissions from Manufacturing Processes)

The surface coating lines (EU-01, EU-02, and EU-03) are not subject to the requirements of 326 IAC 6-3 because these lines use flow, wipe, or roll coating with 100% transfer efficiency and do not emit particulates.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The surface coating lines (EU-01, EU-02, and EU-03) are not subject to the requirements of 326 IAC 8-1-6 because they were all constructed prior to January 1, 1980.

326 IAC 8-2 (Surface Coating Emission Limitations)

The surface coating lines (EU-01, EU-02, and EU-03) were existing as of January 1, 1980 in Elkhart County, and the source has a potential to emit greater than one hundred (100) tons per year of VOC. However, there are no applicable rules under 326 IAC 8-2. These facilities apply surface coating materials to plastic products such as trim, moulding, or baseboards. Therefore, 326 IAC 8-2 does not apply.

State Rule Applicability – PVC and Polystyrene Additives Mixing

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

Pursuant to 326 IAC 6-3-2(e)(2), when operating at a process weight rate that is less than one hundred (100) pounds per hour, the allowable rate of particulate emission from the PVC and polystyrene additives mixing operations is five hundred fifty-one thousandths (0.551) pound per hour. In order to comply with this limit, the Permittee shall operate the baghouses at all times that the PVC and Polystyrene mixing processes are in operation.

State Rule Applicability – PVC and Polystyrene Extrusion

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The extrusion lines are not subject to the requirements of 326 IAC 8-1-6, because they do not have the potential to emit twenty-five (25) tons per year or more of VOC.

State Rule Applicability – Beringer Jet Cleaner

326 IAC 4-2 (Incinerators)

The Beringer Jet Cleaner uses a vacuum pyrolysis process during which a part is heated in the absence of oxygen until the polystyrene falls off of the part. Because there is no oxygen in the system, there is no combustion. Therefore, this cleaner is not an incinerator and is not subject to the requirements of 326 IAC 4-2.

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

Pursuant to 326 IAC 6-3-2(e)(2), when operating at a process weight rate that is less than one hundred (100) pounds per hour, the allowable rate of particulate emissions from the Beringer Jet Cleaner is five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The Beringer Jet Cleaner does not have the potential to emit twenty-five (25) tons of VOC or more per year; therefore, it is not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The Beringer Jet Cleaner is used to remove polystyrene from extrusion tools using vacuum pyrolysis. It does not use organic solvents to perform degreasing operations. Therefore, it is not subject to the requirements of 326 IAC 8-3.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

Because there is no combustion in the Beringer Jet Cleaner, the Beringer Jet Cleaner is not expected to emit CO. Therefore, the Beringer Jet Cleaner is not subject to the requirements of 326 IAC 9-1.

State Rule Applicability – Storage Tanks

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The storage tanks do not have potential VOC emissions of twenty-five (25) or more tons per year. Therefore, the storage tanks are not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The storage tanks are not subject to the requirements of 326 IAC 8-4-3, because they each have a storage capacity less than thirty-nine thousand (39,000) gallons.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The storage tanks are not subject to the requirements of 326 IAC 8-9, because this source is not located in Clark, Floyd, Lake, or Porter Counties.

State Rule Applicability – Fire Pump

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The fire pump is not subject to the requirements of 326 IAC 6-2 because it is not a source of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the fire pump is not subject to the requirements of 326 IAC 6-3 because it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 7 (Sulfur Dioxide Emission Limitations)

This source is located in Elkhart County. The potential to emit of sulfur dioxide from the fire pump is less than twenty-five tons per year and less than ten (10) pounds per hour. Therefore, the requirements of 326 IAC 7-1.1-2 and 326 IAC 7-2 do not apply.

326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE))

The fire pump is not subject to the requirements of 326 IAC 10-5 because it is not a large NOx SIP Call engine.

State Rule Applicability – Natural Gas Combustion

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired combustion units are not subject to 326 IAC 6-2 because they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because they have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The natural gas-fired combustion units are not subject to the requirements of 326 IAC 7-1.1, because the potential sulfur dioxide emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour.

State Rule Applicability – Trimmers

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

The trimmers are saws that are only used to trim the mouldings to length, and they exhaust inside the building. The trimmers have negligible particulate emissions (less than 0.551 pounds per hour). Therefore, pursuant to 326 IAC 6-3-1(b)(14), the trimmers are exempt from the requirements of 326 IAC 6-3.

State Rule Applicability - Polystyrene and PVC Grinders, Regrind Extrusion and Pelletizer, and Pneumatic Conveyance System for Pellet Handling

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

(a) The potential to emit particulates from the pneumatic conveyance (pellet handling) operation using the maximum throughput capacity of 200 pounds per hour and an AP-42 emission factor of 3.14 pounds per ton of material is less than five hundred fifty-one thousandths (0.551) pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), the pneumatic conveyance system is not subject to the requirements of 326 IAC 6-3.

(b) The uncontrolled emission factor used to calculate the potential to emit particulates from the polystyrene and PVC grinders and the regrind pelletizer before controls is based on an AP-42 emission factor of 0.067 pounds per ton (after control using a cyclone) and assuming a cyclone control efficiency of 98.0%. The uncontrolled emission factor is calculated as follows:

$$\text{Uncontrolled Ef (lbs/ton)} = 0.067 \text{ lbs/ton} \times 1/(1 - 98.0\% \text{ Control Efficiency})$$

Uncontrolled Ef (lbs/ton) = 3.35 lbs/ton

- (1) The potential to emit particulates from the PVC grinder and regrind pelletizer using the maximum throughput capacity of each unit (200 pounds per hour) and an uncontrolled emission factor of 3.35 pounds per ton of material is less than five hundred fifty-one thousandths (0.551) pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), these units are not subject to the requirements of 326 IAC 6-3.
- (2) The potential to emit particulates from the polystyrene grinder using the maximum throughput capacity of the grinder (1,000 pounds per hour) and an uncontrolled emission factor of 3.35 pounds per ton of material is 1.68 pounds per hour. Therefore, the polystyrene grinder is subject to the requirements of 326 IAC 6-3.

Pursuant to 326 IAC 6-3-2(e), particulate emissions from the polystyrene grinder shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds per hour. The pound per hour limitation was calculated with the following equation:

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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Based on the uncontrolled emission factor above, the polystyrene grinder is able to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The regrind extruder is not subject to the requirements of 326 IAC 8-1-6 because it does not have the potential to emit twenty-five (25) tons per year or more of VOC.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring or testing requirements included in this permit for the surface coating stations (EU-01 through EU-03) because the permit requires recordkeeping and reporting to demonstrate compliance with the VOC emission limit pursuant to 326 IAC 2-8 and 326 IAC 2-3.

There are no compliance monitoring or testing requirements included in this permit for the polystyrene additives and PVC powder mixing lines. These units are expected to be able to comply with the particulate limit pursuant to 326 IAC 6-3.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal 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 June 27, 2006. Additional information was received on July 18, 2006 and May 7, 2007.

Conclusion

The operation of this plastic mouldings manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. 039-23280-00035.

**Appendix A: Emission Calculations
Emissions From Natural Gas Combustion**

**Company Name: Louisiana Pacific Corporation
Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
FESOP: 039-23280-00035
Reviewer: ERG/SE
Date: January 25, 2008**

Total Maximum Heat Input Capacity
(MMBtu/hr)

35.0

Potential Throughput
(MMscf/yr)

301

| | Pollutant | | | | | | |
|-----------------------------|-----------|-------|-----------------|--------------------|------|------|------|
| | PM* | PM10* | SO ₂ | NO _x ** | VOC | CO | HAPs |
| Emission Factor (lbs/MMscf) | 1.9 | 7.6 | 0.6 | 100 | 5.5 | 84.0 | 1.89 |
| Potential to Emit (tons/yr) | 0.29 | 1.14 | 0.09 | 15.0 | 0.83 | 12.6 | 0.28 |

* PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

**Emission factor for NO_x (Uncontrolled) = 100 lb/MMscf.

Emission factors are from AP-42, Chapter 1.4, 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 (7/98).

All Emission factors are based on normal firing.

Methodology

Potential Throughput (MMscf/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMscf/1,020 MMBtu

PTE (tons/yr) = Potential Throughput (MMscf/yr) x Emission Factor (lbs/MMscf) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Particulate, VOC, and HAP Emissions from the Extrusion Operations

Company Name: Louisiana Pacific Corporation
Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
FESOP: 039-23280-00035
Reviewer: ERG/SE
Date: January 25, 2008

| Emission Unit | Material | Maximum Throughput Rate (lbs/hr) | PM/PM10 Emission Factor (lbs/MM lbs Material) | PTE PM/PM10 (tons/yr) | VOC Emission Factor (lbs/MM lbs Material) | PTE VOC (tons/yr) | Ethyl Benzene Emission Factor (lbs/MM lbs Material) | PTE Ethyl Benzene (tons/yr) | Styrene Emission Factor (lbs/MM lbs Material) | PTE Styrene (tons/yr) |
|--------------------------------------|-------------|----------------------------------|---|-----------------------|---|-------------------|---|-----------------------------|---|-----------------------|
| One (1) Extrusion Area (PVC) | PVC | 200 | NA | NA | 63.0 | 0.06 | NA | NA | NA | NA |
| One (1) Extrusion Area (Polystyrene) | Polystyrene | 4,100 | NA | NA | 53.3 | 0.96 | 6.10 | 1.10E-01 | 44.3 | 7.96E-01 |
| Polystyrene Regrind Extruder* | Polystyrene | 164 | NA | NA | 53.3 | 0.04 | 6.10 | 4.38E-03 | 44.3 | 3.18E-02 |
| Total | | | | | | 1.05 | | 1.14E-01 | | 8.27E-01 |

Total HAPs **0.94**

NA - emission factors are not available for these material/pollutant combinations.

Emission factors for PVC processing is taken from "Process Emissions for Vinyl Pipe Industry", Journal of Vinyl & Additive Technology, Vol 2, No.3, 09/96.

Emission factors for Polystyrene are from "Sampling and Analysis of Fumes Evolved During Thermal Processing of Polystyrene Resins", Dow Chemical, et al.

*The polystyrene regrind extruder is used to extrude regrind (scrap) material that has been processed in the polystyrene grinder. The polystyrene scrap rate is 4% or less. Therefore, the maximum throughput is limited to 4% of the polystyrene extrusion area throughput. The VOC emissions from regrind extrusion are expected to be less than when the material is initially extruded; however, the same emission factors are used above to represent a worst-case scenario.

Methodology

PTE (tons/yr) = Maximum Throughput Rate (lbs/hr) x Emission Factor (lbs/MM lbs Material) x 1 MM lb/1,000,000 lbs x 8,760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
VOC Emissions from Surface Coating**

**Company Name: Louisiana Pacific Corporation
Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
FESOP: 039-23280-00035
Reviewer: ERG/SE
Date: January 25, 2008**

| Emission Unit ID | Number of Coating Lines | Material | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Emission Factor* | Maximum Usage per Line (gal/hr) | Pounds VOC per Gallon of Coating | Unlimited PTE VOC (lbs/hr) | Unlimited PTE VOC (lbs/day) | Unlimited PTE VOC (tons/yr) |
|------------------|-------------------------|-----------------------------------|-------------------|------------------------------------|----------------|-------------------|------------------|---------------------------------|----------------------------------|----------------------------|-----------------------------|-----------------------------|
| EU-01 | 5 | White Flowcoat/Curtain Coat Paint | 11.1 | 5.02% | 0.00% | 5.02% | 1.00 | 5.00 | 0.55 | 13.9 | 333 | 60.7 |
| EU-02 | 11 | White Wipe Coat Paint | 10.8 | 7.52% | 0.00% | 7.52% | 1.00 | 2.00 | 0.81 | 17.87 | 429 | 78.3 |
| EU-03 | 4 | Rollcoat Ink | 8.25 | 72.9% | 0.00% | 72.9% | 0.10 | 5.00 | 6.01 | 12.0 | 289 | 52.7 |
| EU-03 | 4 | Offset Roll Wash Solvent | 6.92 | 98.9% | 0.00% | 98.9% | 0.10 | 5.00 | 6.84 | 13.7 | 328 | 59.9 |
| Total | | | | | | | | | | 57.5 | 1,379 | 252 |

*The source reports an emission factor of 0.1 for the roll coat process (EU-03), because most of the ink and solvent are collected as waste liquid and are not emitted. The application methods are flowcoat/curtain coat, wipe, and roll coat with transfer efficiencies of 100%. Therefore, particulate emissions are not expected for these processes.

Methodology

Unlimited PTE VOC (lbs/hr) = Maximum Usage per Line (gal/hr) x Number of Coating Lines x Pounds VOC per Gallon of Coating (lbs/gal) x Emission Factor

Unlimited PTE VOC (lbs/day) = Unlimited PTE VOC (lbs/hr) * 24 hrs/day

Unlimited PTE VOC (tons/yr) = Unlimited PTE VOC (lbs/hr) * 8,760 hrs/yr * 1 ton/2,000 lbs

**Appendix A: Emission Calculations
HAP Emissions from Surface Coating**

Company Name: Louisiana Pacific Corporation
Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
FESOP: 039-23280-00035
Reviewer: ERG/SE
Date: January 25, 2008

| Emission Unit ID | Number of Coating Lines | Material | Density (lbs/gal) | Weight % HAPs | Emission Factor | Maximum Usage per Line (gal/hr) | Unlimited PTE HAPs (tons/yr) |
|------------------|-------------------------|--------------------------|-------------------|---------------|-----------------|---------------------------------|------------------------------|
| EU-03 | 4 | Offset Roll Wash Solvent | 6.92 | 3.86% | 0.10 | 5.00 | 2.34 |

According to the calculations provided by the source, the materials used in EU-01 and EU-02 do not contain any HAPs.

Methodology

Unlimited PTE HAPs (tons/yr) = Maximum Usage per Line (gal/hr) x Number of Coating Lines x Density (lbs/gal) x Weight % HAPs x 8,760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
One (1) Diesel-fired Fire Pump**

**Company Name: Louisiana Pacific Corporation
Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
FESOP: 039-23280-00035
Reviewer: ERG/SE
Date: January 25, 2008**

Maximum Output
325 hp

Maximum Input*
0.83 MMBtu/hr

Sulfur Content %
0.50

| Emission Factor in lb/hp-hr | Pollutant | | | | | | |
|---|-----------|----------|-----------------------|----------|----------|----------|------------------------|
| | PM** | PM10** | SO ₂ | NOx | VOC | CO | HAPs* |
| | 7.00E-04 | 7.00E-04 | 4.05E-03 8.09E-3 S | 2.40E-02 | 7.05E-04 | 5.50E-03 | 1.49E-03 (lb/MMBtu) |
| Potential to Emit in tons/yr at 500 hrs/yr | 5.69E-02 | 5.69E-02 | 0.33 | 1.95 | 0.06 | 0.45 | 3.08E-04 |

Emission Factors are from AP42, Chapter 3.4, Tables 3.4-1, 3.4-3 and 3.4-4 [10/96].

*The HAP emission factors in AP42, Chapter 3.4, Tables 3.4-3 and 3.4-4 are presented in pounds per MMBtu.

In order to show the PTE of HAPs from the fire pump, the known Maximum Output in horsepower was converted to MMBtu/hr using the conversion factor shown in AP42, Appendix A [9/85, reformatted 1/95] for converting horsepower (electric) to Btu (mean)/hour.

**Assume PM equals PM10

Methodology

Potential to Emit (tons/yr) = Maximum Output (hp) x Emission Factor (lb/hp-hr) x 500 hrs/yr x 1 ton/2,000 lbs

Potential to Emit HAPs (tons/yr) = Maximum Input (MMBtu/hr) x Emission Factor (lb/MMBtu) x 500 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Beringer Jet Cleaner**

**Company Name: Louisiana Pacific Corporation
Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
FESOP: 039-23280-00035
Reviewer: ERG/SE
Date: January 25, 2008**

1. Worst Case Emissions

| Insignificant Emission Thresholds | PM | PM10 | VOC | Single HAP | Combined HAPs |
|-----------------------------------|-------------|-------------|-------------|-------------|---------------|
| lbs/hr | N/A | 5.00 | 3.00 | N/A | N/A |
| lbs/day | N/A | 25.0 | 15.0 | 5.00 | 12.5 |
| tons/yr | 5.00 | 4.56 | 2.74 | 1.00 | 2.00 |

The Beringer Jet Cleaner uses a vacuum pyrolysis process to remove polystyrene from extrusion tools. The parts are put in a vacuum and the polystyrene falls off of the part without combusting. The exhaust gas passes through a water (jet) stream and carbon filter to remove PM, PM10, VOC, and HAPs, and then the waste water is sent to a POTW. This process is expected to have minimal emissions; therefore, it was considered an insignificant emission unit in previous approvals for this source. The Beringer Jet Cleaner will be considered an insignificant emission unit in this FESOP Renewal. In order to ensure that the worst case emissions are considered for permit level and rule applicability determination, the insignificant emission unit thresholds from 326 IAC 2-7-1(21) are considered to be the potential to emit of this unit.

2. Potential Emission Calculations

Control Efficiency (%) of Water Spray and Carbon Filter

80%

| | PM | PM10 | VOC | Single HAP | Combined HAPs |
|---|----------|----------|----------|------------|---------------|
| Potential to Emit After Controls (lbs/hr) | 1.50E-03 | 1.50E-03 | 3.80E-02 | 1.20E-03 | 1.90E-03 |
| Potential to Emit After Controls (tons/yr) | 6.57E-03 | 6.57E-03 | 0.17 | 5.26E-03 | 8.32E-03 |
| Potential to Emit Before Controls (lbs/hr) | 7.50E-03 | 7.50E-03 | 0.19 | 6.00E-03 | 9.50E-03 |
| Potential to Emit Before Controls (tons/yr) | 3.29E-02 | 3.29E-02 | 0.83 | 2.63E-02 | 4.16E-02 |

The predicted emission rate in pounds per hour after the control (water spray and carbon filter) is based on manufacturer's emission test data. Assuming an 80% control efficiency for the water spray and carbon filter, the expected potential to emit before controls is less than the insignificant emission unit thresholds. Based on the expected potential to emit PM before controls, the Beringer Jet Cleaner is able to comply with a PM emission limit of 0.551 pursuant to 326 IAC 6-3.

Appendix A: Emission Calculations
Particulate Emissions from the Regrind Pelletizer and Pellet Handling

Company Name: Louisiana Pacific Corporation
Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
FESOP: 039-23280-00035
Reviewer: ERG/SE
Date: January 25, 2008

| Emission Unit | Maximum Amount of Scrap (lbs/yr) | PM Emission Factor (lbs/ton material) | PM10 Emission Factor (lbs/ton material) | Control Efficiency % | PTE PM (tons/yr) | PTE PM10 (tons/yr) |
|----------------------|----------------------------------|---------------------------------------|---|----------------------|------------------|--------------------|
| PVC Grinder* | 70,080 | 0.067 | 0.034 | 98.0% | 0.06 | 0.03 |
| Polystyrene Grinder* | 1,436,640 | 0.067 | 0.034 | 98.0% | 1.20 | 0.60 |
| Regrind Pelletizer** | 1,436,640 | 0.067 | 0.034 | 98.0% | 1.20 | 0.60 |
| Pellet Handling*** | 1,436,640 | 3.14 | 1.10 | NA | 1.13 | 0.40 |
| | | | | Total | 3.59 | 1.63 |

* The PVC and polystyrene grinders are used to reduce the size of scrap material so that it can be reused. The scrap rate for both PVC and polystyrene production is 4% or less. The PVC grinder is controlled by a cyclone and the polystyrene grinder is controlled by a baghouse. The polystyrene grinder uses a rotating blade with teeth to reduce the particle size. As a worst-case scenario, emission factors from AP-42, Chapter 9.9.1, Table 9.9.1-2 for hammermill grain milling controlled by a cyclone have been used to estimate emissions (3/03). The particulate emissions from grain handling are expected to be worse than the particulate emissions from the PVC and polystyrene grinding. Because the emission factor is based on using a cyclone, as a worst-case scenario a control efficiency of 98% for a cyclone has been used to estimate the PTE of PM/PM10 before controls. The actual emissions from these units are expected to be less than the values calculated above.

** The regrind extrusion and pelletizer unit is used to extrude scrap polystyrene (regrind) and to make pellets out of this extruded material. The unit is enclosed and exhausts inside the building. The extruded material is in the form of solid strands when it enters the pelletizer (strand cutter). The strands are cut into pellets using rotating knives. The pellets fall into a hopper, where they are pneumatically conveyed to a storage silo. The emission factors for the Regrind Pelletizer are from AP-42, Chapter 9.9.1, Table 9.9.1-2 for a hammermill grain milling process with a cyclone at an animal feed mill (3/03). This emission factor is used as a worst case scenario for the regrind pelletizer because there are no emission factors available in AP-42 for pelletizing polystyrene. Grain milling is expected to have more particulate emissions than the pelletizing done at this unit. Because the emission factor is based on using a cyclone, as a worst-case scenario a control efficiency of 98% for a cyclone has been used to estimate the PTE of PM/PM10 before controls. The actual emissions from these units are expected to be less than the values calculated above.

*** The emission factors for pneumatic pellet handling are from AP-42, Chapter 11.12, Table 11.12-2 for pneumatic cement supplement unloading to an elevated storage silo. There are no AP-42 emission factors available in AP-42 for the type of pellet handling done at this source. Both cement supplement unloading to an elevated storage silo and the pellet handling process at this plant use pneumatic conveyance, but cement supplement unloading is expected to have more particulate emissions than the pellet handling done at this source.

Because these units only handle scrap material, the throughput is limited to the amount of scrap material produced (Maximum Amount of Scrap).

Methodology

Maximum Amount of Scrap (lbs/yr) = Maximum Throughput of PVC or Polystyrene Extrusion (lbs/hr) x 4% scrap rate x 8,760 hrs/yr

Grinders and Pelletizers:

PTE PM/PM10 (tons/yr) = Maximum Throughput Rate (lbs/hr) x 1 ton/2,000 lbs x Emission Factor (lbs/ton) x 8,760 hrs/yr x 1 ton/2,000 lbs / (1 - Control Efficiency %)

Pellet Handling

PTE PM/PM10 (tons/yr) = Maximum Throughput Rate (lbs/hr) x 1 ton/2,000 lbs x Emission Factor (lbs/ton) x 8,760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Emissions Summary**

**Company Name: Louisiana Pacific Corporation
Address: 219 U.S. Highway 20 West, Middlebury, Indiana 46540
FESOP: 039-23280-00035
Reviewer: ERG/SE
Date: January 25, 2008**

| | Unlimited PTE (tons/yr) | | | | | | |
|---------------------------------------|-------------------------|-------------|-----------------|-----------------|------------|-------------|-------------|
| | PM | PM10 | SO ₂ | NO _x | VOC | CO | HAPs |
| Coating Lines | -- | -- | -- | -- | 252 | -- | 2.34 |
| Mixing Processes* | 9.13 | 9.13 | -- | -- | -- | -- | -- |
| Extrusion | -- | -- | -- | -- | 1.05 | -- | 0.94 |
| Trimmers** | Negligible | Negligible | -- | -- | -- | -- | -- |
| Jet Cleaner | 5.00 | 4.56 | -- | -- | 2.74 | -- | 2.00 |
| Tank Losses | -- | -- | -- | -- | 1.23 | -- | -- |
| Fire Pump | 0.06 | 0.06 | 0.33 | 1.95 | 0.06 | 0.45 | 3.08E-04 |
| Natural Gas Combustion | 0.29 | 1.14 | 0.09 | 15.0 | 0.83 | 12.6 | 0.28 |
| Grinders, Pelletizer, Pellet Handling | 3.59 | 1.63 | -- | -- | -- | -- | -- |
| Total | 18.1 | 16.5 | 0.42 | 17.0 | 258 | 13.1 | 5.57 |

| | Limited PTE (tons/yr) | | | | | | |
|---------------------------------------|-----------------------|-------------|-----------------|-----------------|-------------|-------------|-------------|
| | PM | PM10 | SO ₂ | NO _x | VOC | CO | HAPs |
| Coating Lines | -- | -- | -- | -- | 94.0 | -- | 2.34 |
| Mixing Processes* | 9.13 | 9.13 | -- | -- | -- | -- | -- |
| Extrusion | -- | -- | -- | -- | 1.05 | -- | 9.41E-01 |
| Trimmers** | Negligible | Negligible | -- | -- | -- | -- | -- |
| Jet Cleaner | 5.00 | 4.56 | -- | -- | 2.74 | -- | 2.00 |
| Tank Losses | -- | -- | -- | -- | 1.23 | -- | -- |
| Fire Pump | 0.06 | 0.06 | 0.33 | 1.95 | 0.06 | 0.45 | 3.08E-04 |
| Natural Gas Combustion | 0.29 | 1.14 | 0.09 | 15.0 | 0.83 | 12.6 | 0.28 |
| Grinders, Pelletizer, Pellet Handling | 3.59 | 1.63 | -- | -- | -- | -- | -- |
| Total | 18.1 | 16.5 | 0.42 | 17.0 | 99.9 | 13.1 | 5.57 |

*The mixing processes consist of polystyrene and PVC additive mixing areas. The emissions are expected to be insignificant and are controlled by baghouses. The insignificant thresholds are assigned above to represent worst-case emissions.

**The trimmers are saws that are used to trim the mouldings to length. The trimmers exhaust inside the building and are expected to have negligible emissions.