



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: March 22, 2007
RE: C & M Fine Pack / 003-23606-00346
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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New Source Construction and Minor Source Operating Permit

OFFICE OF AIR QUALITY

**C & M Fine Pack
7707 Vicksburg Pike
Fort Wayne, Indiana 46804**

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

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

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

Operation Permit No.: MSOP 003-23606-00346	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: March 22, 2007 Expiration Date: March 22, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary molded plastic packaging plant.

Authorized Individual:	Andrew Falcon, CEO
Source Address:	7707 Vicksburg Pike, Fort Wayne, Indiana 46804
Mailing Address:	7707 Vicksburg Pike, Fort Wayne, Indiana 46804
General Source Phone Number:	(260) 436-7225
SIC Code:	3842
County Location:	Allen
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Twenty (20) granular polystyrene storage silos located inside, each with a capacity of 516 cubic feet, each using a baghouse filter for particulate control, consisting of:
 1. six (6) units, identified as #1 - #6, installed in 1991;
 2. six (6) units, identified as #7 - #12, installed in 2001; and
 3. eight (8) units, identified as #13 - #20, installed in 2005.

- (b) Thirty-six (36) granular polystyrene storage silos located outdoors, each with a capacity of 4,025 cubic feet, each using a baghouse filter for particulate control, consisting of:
 1. ten (10) units, identified as #1 - #10, installed in 1991;
 2. five (5) units, identified as #11 - #15, installed in 1995;
 3. twelve (12) units, identified as #16 - #27, installed in 2001; and
 4. nine (9) units, identified as #28 - #36, installed in 2005.

- (c) Natural gas fired combustion units each with heat input capacities equal to or less than ten million (10,000,000) BTU per hour, with a combined heat input capacity of 55.5 MMBtu/hr, itemized as follows:
 1. twenty (20) heater units, identified as #1-20, installed in 1992;
 2. thirteen (13) heater units, identified as #21-33, installed in 2001; and
 3. eight (8) heating units, identified as #34-42, installed in 2005.

- (d) Fifteen (15) plastics extruders, with a combined maximum capacity of 13 tons of plastic per hour, uncontrolled, and exhausting to stack (EX-RT). These units consist of:
1. four (4) units, identified as #1, #2, #6 and #7, installed in 1991;
 2. one (1) unit, identified as #3, installed in 1995;
 3. six (6) units, identified as #4, #5, #8, #9, #10 and #11 installed in 2001;
 4. three (3) units, identified as #12, #13 and #14 installed in 2005; and
 5. one (1) unit, identified as #15, installed in 2006.
- (e) Thirty (30) plastic thermoformers, with a combined maximum capacity of 22.5 tons of plastic per hour, uncontrolled, and exhausting to stack (R-VC700). These units consist of:
1. four (4) units, identified as #1, #2, #3 and #4, installed in 1990;
 2. one (1) unit, identified as #5, installed in 1992;
 3. six (6) units, identified as #6, #7, #8, #9, #10 and #11 installed in 1995;
 4. two (2) units, identified as #12 and #13 installed in 1997;
 5. ten (10) units, identified as #14, #15, #16, #17, #18, #19, #20, #21, #22 and #23, installed in 2001;
 6. two (2) units, identified as #24 and #25 installed in 2004;
 7. two (2) units, identified as #26 and #27 installed in 2005; and
 8. three (3) units, identified as #28, #29 and #30 installed in 2006.
- (f) Forty-one (41) grinders, with a combined maximum capacity of 16 tons of plastic per hour, uncontrolled, exhausting within the building. These units consist of:
1. nine (9) units, identified as #1, #2, #4, #5, #6, #7, #8, #13 and #14, installed in 1991;
 2. six (6) units, identified as #3, #9, #10, #11, #12 and #15, installed in 1995;
 3. two (2) units, identified as #16 and #17, installed in 1997;
 4. thirteen (13) units, identified as #18, #19, #20, #21, #22, #23, #27, #28, #29, #30, #37, #38 and #39, installed in 2001;
 5. two (2) units, identified as #40 and #41, installed in 2004;
 6. six (6) units, identified as #31, #32, #33, #34, #35 and #36, installed in 2005; and
 7. three (3) units, identified as #24, #25 and #26, installed in 2006.
- (g) Three (3) ultraviolet cure ink printers, with a combined maximum capacity of 200 pounds of ink per year, uncontrolled, not venting to a stack, consisting of:
1. two (2) units, identified as #1 and #2, installed in 1992; and
 2. one (1) unit, identified as #3, installed in 1996.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

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

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

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

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, MSOP 003-23606-00346, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

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

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

- (a) All terms and conditions of permits established prior to MSOP 003-23606-00346 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source.

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.17 Source Modification Requirement

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

B.18 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under 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.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 Annual Fee Payment [326 IAC 2-1.1-7]

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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
Indianapolis, Indiana 46204-2251

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by 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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected 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 and 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 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

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

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

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Fifteen (15) plastics extruders, with a combined maximum capacity of 13 tons of plastic per hour, uncontrolled, and exhausting to stack (EX-RT). These units consist of:
1. four (4) units, identified as #1, #2, #6 and #7, installed in 1991;
 2. one (1) unit, identified as #3, installed in 1995;
 3. six (6) units, identified as #4, #5, #8, #9, #10 and #11 installed in 2001;
 4. three (3) units, identified as #12, #13 and #14 installed in 2005; and
 5. one (1) unit, identified as #15, installed in 2006.
- (b) Thirty (30) plastic thermoformers, with a combined maximum capacity of 22.5 tons of plastic per hour, uncontrolled, and exhausting to stack (R-VC700). These units consist of:
1. four (4) units, identified as #1, #2, #3 and #4, installed in 1990;
 2. one (1) unit, identified as #5, installed in 1992;
 3. six (6) units, identified as #6, #7, #8, #9, #10 and #11 installed in 1995;
 4. two (2) units, identified as #12 and #13 installed in 1997;
 5. ten (10) units, identified as #14, #15, #16, #17, #18, #19, #20, #21, #22 and #23, installed in 2001;
 6. two (2) units, identified as #24 and #25 installed in 2004;
 7. two (2) units, identified as #26 and #27 installed in 2005; and
 8. three (3) units, identified as #28, #29 and #30 installed in 2006.
- (c) Forty-one (41) grinders, with a combined maximum capacity of 16 tons of plastic per hour, uncontrolled, exhausting within the building. These units consist of:
1. nine (9) units, identified as #1, #2, #4, #5, #6, #7, #8, #13 and #14, installed in 1991;
 2. six (6) units, identified as #3, #9, #10, #11, #12 and #15, installed in 1995;
 3. two (2) units, identified as #16 and #17, installed in 1997;
 4. thirteen (13) units, identified as #18, #19, #20, #21, #22, #23, #27, #28, #29, #30, #37, #38 and #39, installed in 2001;
 5. two (2) units, identified as #40 and #41, installed in 2004;
 6. six (6) units, identified as #31, #32, #33, #34, #35 and #36, installed in 2005; and
 7. three (3) units, identified as #24, #25 and #26, installed in 2006.

(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 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from grinders Nos. 9-12 shall each not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

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

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

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

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	C & M Fine Pack
Address:	7707 Vicksburg Pike
City:	Fort Wayne, Indiana 46804
Phone #:	(260) 436-7225
MSOP #:	003-23606-00346

I hereby certify that C & M Fine Pack is :	<input type="checkbox"/> still in operation.
	<input type="checkbox"/> no longer in operation.
I hereby certify that C & M Fine Pack is :	<input type="checkbox"/> in compliance with the requirements of MSOP 003-23606-00346.
	<input type="checkbox"/> not in compliance with the requirements of MSOP 003-23606-00346.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

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

Source Name: C & M Fine Pack
Source Address: 7707 Vicksburg Pike, Fort Wayne, Indiana 46804
Mailing Address: 7707 Vicksburg Pike, Fort Wayne, Indiana 46804
MSOP No.: 003-23606-00346

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 Notification
- 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**

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

Source Background and Description

Source Name:	C & M Fine Pack
Source Location:	7707 Vicksburg Pike, Fort Wayne IN 46804
County:	Allen
SIC Code:	3842
Permit No.:	M003-23606-00346
Permit Reviewer:	Julia Handley/EVP

The Office of Air Quality (OAQ) has reviewed an application from C & M Fine Pack relating to the construction and operation of a molded plastic packaging plant.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) Fifteen (15) plastics extruders, with a combined maximum capacity of 13 tons of plastic per hour, uncontrolled, and exhausting to stack (EX-RT). These units consist of:
 - 1. four (4) units, identified as #1, #2, #6 and #7, installed in 1991;
 - 2. one (1) unit, identified as #3, installed in 1995;
 - 3. six (6) units, identified as #4, #5, #8, #9, #10 and #11 installed in 2001;
 - 4. three (3) units, identified as #12, #13 and #14 installed in 2005; and
 - 5. one (1) unit, identified as #15, installed in 2006.

- (b) Thirty (30) plastic thermoformers, with a combined maximum capacity of 22.5 tons of plastic per hour, uncontrolled, and exhausting to stack (R-VC700). These units consist of:
 - 1. four (4) units, identified as #1, #2, #3 and #4, installed in 1990;
 - 2. one (1) unit, identified as #5, installed in 1992;
 - 3. six (6) units, identified as #6, #7, #8, #9, #10 and #11 installed in 1995;
 - 4. two (2) units, identified as #12 and #13 installed in 1997;
 - 5. ten (10) units, identified as #14, #15, #16, #17, #18, #19, #20, #21, #22 and #23, installed in 2001;
 - 6. two (2) units, identified as #24 and #25 installed in 2004;
 - 7. two (2) units, identified as #26 and #27 installed in 2005; and
 - 8. three (3) units, identified as #28, #29 and #30 installed in 2006.

- (c) Forty-one (41) grinders, with a combined maximum capacity of 16 tons of plastic per hour, uncontrolled, exhausting within the building. These units consist of:
 - 1. nine (9) units, identified as #1, #2, #4, #5, #6, #7, #8, #13 and #14, installed in 1991;
 - 2. six (6) units, identified as #3, #9, #10, #11, #12 and #15, installed in 1995;
 - 3. two (2) units, identified as #16 and #17, installed in 1997;
 - 4. thirteen (13) units, identified as #18, #19, #20, #21, #22, #23, #27, #28, #29, #30, #37, #38 and #39, installed in 2001;
 - 5. two (2) units, identified as #40 and #41, installed in 2004;

6. six (6) units, identified as #31, #32, #33, #34, #35 and #36, installed in 2005; and
 7. three (3) units, identified as #24, #25 and #26, installed in 2006.
- (d) Three (3) ultraviolet cure ink printers, with a combined maximum capacity of 200 pounds of ink per year, uncontrolled, not venting to a stack, consisting of:
1. two (2) units, identified as #1 and #2, installed in 1992; and
 2. one (1) unit, identified as #3, installed in 1996.
- (e) Twenty (20) granular polystyrene storage silos located inside, each with a capacity of 516 cubic feet, each using a baghouse filter for particulate control, consisting of:
1. six (6) units, identified as #1 - #6, installed in 1991;
 2. six (6) units, identified as #7 - #12, installed in 2001; and
 3. eight (8) units, identified as #13 - #20, installed in 2005.
- (f) Thirty-six (36) granular polystyrene storage silos located outdoors, each with a capacity of 4,025 cubic feet, each using a baghouse filter for particulate control, consisting of:
1. ten (10) units, identified as #1 - #10, installed in 1991;
 2. five (5) units, identified as #11 - #15, installed in 1995;
 3. twelve (12) units, identified as #16 - #27, installed in 2001; and
 4. nine (9) units, identified as #28 - #36, installed in 2005.
- (g) Natural gas fired combustion units each with heat input capacities equal to or less than ten million (10,000,000) BTU per hour, with a combined heat input capacity of 55.5 MMBtu/hr, itemized as follows:
1. twenty (20) heater units, identified as #1-20, installed in 1992;
 2. thirteen (13) heater units, identified as #21-33, installed in 2001; and
 3. eight (8) heating units, identified as #34-42, installed in 2005.

Existing Approvals

This source has no existing approvals.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (oF)
EX-RT	Extruders	3	0.3	440	100-150
R-VC700	Plastic Thermoformers	3	1.0	494	100-150

Recommendation

The staff recommends to the Commissioner that this MSOP 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 administratively incomplete application for the purposes of this review was received on September 5, 2006. Additional information received on September 7, 2006 makes the MSOP application administratively complete.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 9)

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	88.75
PM-10	90.14
SO ₂	0.15
VOC	11.15
CO	20.44
NO _x	24.33

HAPs	Potential to Emit (tons/yr)
Hexane	Less than 10
Formaldehyde	Less than 10
Total	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, and PM₁₀ are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) 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. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (c) Allen County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for 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 a surrogate for PM2.5 emissions.
- (d) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	44.20
PM-10	45.58
SO ₂	0.15
VOC	11.15
CO	20.44
NO _x	24.33
Single HAP	Less than 10
Combination HAPs	Less than 25

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

This source is not considered a major source because it is not one of the 28 listed source categories and the potential to emit of all regulated pollutants is less than 250 tons per year (tpy). Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-3 Emission Offset

Allen County has been designated as basic nonattainment for the 8-hour ozone standard. This source is not considered a major source because the potential to emit of NO_x and VOC are each less than 100 tons per year. Therefore, this source has been operating as a minor source pursuant to 326 IAC 2-3, Emission Offset.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

The operation of the facilities at this molded plastic packaging plant will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. Since the facilities at this source have the potential to emit less than 25 tons per year VOC, they are not subject to 326 IAC 8-1-6.

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

The requirements of 326 IAC 6-3-2 are not applicable to the fifteen (15) plastics extruders, thirty (30) plastic thermoformers, grinders Nos. 1-8 and 13-41, three (3) ultraviolet cure ink printers, thirty six (36) outdoor resin storage silos, or twenty (20) indoor resin storage silos. These units each have potential emissions below 0.551 pounds PM per hour, and pursuant to 326 IAC 6-3-1(b)(14), are exempt from the requirements of 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from grinders Nos. 9-12 shall each not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

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

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

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

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

Conclusion

The operation of this molded plastic packaging plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 003-23606-00346.

**Appendix A: Emissions Calculations
Summary**

Company Name: C&M Fine Pack
Address City IN Zip: 7707 Vicksburg Pike, Fort Wayne IN 46804
Permit Number: 003-23606-00346
Plt ID: 003-00346
Reviewer: JH/EVP

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Thermoforming machines	Extruder Machines	Grinding	UV Printing	Natural Gas Usage	Silo storage	TOTAL
PM	12.83	5.45	24.45	0.00	0.46	45.55	88.75
PM10	12.83	5.45	24.45	0.00	1.85	45.55	90.14
SO2	0.00	0.00	0.00	0.00	0.15	0.00	0.15
NOx	0.00	0.00	0.00	0.00	24.33	0.00	24.33
VOC	6.05	3.56	0.00	0.20	1.34	0.000	11.15
CO	0.00	0.00	0.00	0.00	20.44	0.00	20.44
total HAPs	0.00	0.01	0.00	0.00	0.46	0.00	0.47
worst case single HAP	0.00	0.00	0.00	0.00	0.4	0.00	0.44

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Thermoforming machines	Extruder Machines	Grinding	UV Printing	Natural Gas Usage	Silo storage	TOTAL
PM	12.83	5.45	24.45	0.00	0.46	1.00	44.20
PM10	12.83	5.45	24.45	0.00	1.85	1.00	45.58
SO2	0.00	0.00	0.00	0.00	0.15	0.00	0.15
NOx	0.00	0.00	0.00	0.00	24.33	0.00	24.33
VOC	6.05	3.56	0.00	0.20	1.34	0.00	11.15
CO	0.00	0.00	0.00	0.00	20.44	0.00	20.44
total HAPs	0.00	0.00	0.00	0.00	0.46	0.00	0.46
worst case single HAP	0.00	0.00	0.00	0.00	0.44	0.00	0.44

Total emissions based on rated capacity at 8,760 hours/year, after control.

**Appendix A: Emissions Calculations
PM and VOC Emissions
Thermoformers**

Company Name: C&M Fine Pack
Address City IN Zip: 7707 Vicksburg Pike, Fort Wayne IN 46804
Permit Number: 003-23606-00346
Pit ID: 003-00346
Reviewer: JH/EVP

Equipment Name	Maximum Process Weight Rate (lbs/hr)	Particulate Matter			VOC		
		Emission Factor lbs/ton	Potential lbs/hr	Potential tons/yr	Emission Factor lbs/MMlbs	Potential lbs/hr	Potential tons/yr
Thermoformer 1	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 2	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 3	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 4	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 5	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 6	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 7	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 8	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 9	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 10	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 11	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 12	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 13	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 14	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 15	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 16	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 17	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 18	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 19	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 20	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 21	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 22	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 23	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 24	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 25	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 26	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 27	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 28	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 29	1500	0.1302	0.098	0.428	0.061	0.046	0.202
Thermoformer 30	1500	0.1302	0.098	0.428	0.061	0.046	0.202

Total Potential PM 12.83 tons per year
Total potential VOC 6.05 tons per year

These emission are exhausted through the Rietschle VC700 Vacuum Pump, The stack diameter is 12" pipe, and extends from roof to a height of 36", the exit temperature is 100°F to 150°F

PM and VOC emission factors based on fact sheet #9847 (Rev. 11, 2005) Michigan Department of Environmental Quality Assume PM emissions are equal to PM10.

**Appendix A: Emissions Calculations
PM and VOC emissions
Extruders**

Company Name: C&M Fine Pack
Address City IN Zip: 7707 Vicksburg Pike, Fort Wayne IN 46804
Permit Number: 003-23606-00346
Plt ID: 003-00346
Reviewer: JH/EVP

Equipment Name	Maximum Process Weight Rate (lbs/hr)	Particulate Matter			VOC		
		Emission Factor lbs/ton	Potential lbs/hr	Potential tons/yr	Emission Factor lbs/MMlbs	Potential lbs/hr	Potential tons/yr
Extruder 1	1800	9.58E-02	0.086	0.378	7.06E-02	0.064	0.278
Extruder 2	1200	9.58E-02	0.057	0.252	7.06E-02	0.042	0.186
Extruder 3	2000	9.58E-02	0.096	0.420	7.06E-02	0.071	0.309
Extruder 4	2500	9.58E-02	0.120	0.525	7.06E-02	0.088	0.387
Extruder 5	2500	9.58E-02	0.120	0.525	7.06E-02	0.088	0.387
Extruder 6	1200	9.58E-02	0.057	0.252	7.06E-02	0.042	0.186
Extruder 7	1200	9.58E-02	0.057	0.252	7.06E-02	0.042	0.186
Extruder 8	2500	9.58E-02	0.120	0.525	7.06E-02	0.088	0.387
Extruder 9	1500	9.58E-02	0.072	0.315	7.06E-02	0.053	0.232
Extruder 10	1500	9.58E-02	0.072	0.315	7.06E-02	0.053	0.232
Extruder 11	1500	9.58E-02	0.072	0.315	7.06E-02	0.053	0.232
Extruder 12	1500	9.58E-02	0.072	0.315	7.06E-02	0.053	0.232
Extruder 13	1500	9.58E-02	0.072	0.315	7.06E-02	0.053	0.232
Extruder 14	1800	9.58E-02	0.086	0.378	7.06E-02	0.064	0.278
Extruder 15	1800	9.58E-02	0.086	0.378	7.06E-02	0.064	0.278

26000

113880

Total Potential PM 5.45 tons per year
Total potential VOC 3.56 lbs/hr

These emission are exhausted through the Rietschle Twister Vacuum Pump, The stack diameter is 4" pipe, and extends from roof to a height of 36", the exit temperature is 100°F to 150°F.

PM and VOC emission factors based on fact sheet #9847 (Rev. 11, 2005) Michigan Department of Environmental Quality
Assume PM emissions are equal to PM10.

**Appendix A: Emissions Calculations
PM Emissions
Grinding**

Company Name: C&M Fine Pack
Address City IN Zip: 7707 Vicksburg Pike, Fort Wayne IN 46804
Permit Number: 003-23606-00346
Plt ID: 003-00346
Reviewer: JH/EVP

Equipment Name	Maximum Process Weight Rate (lbs/hr)	Particulate Matter		
		Emission Factor (lbs/MMlbs)	Potential (lbs/hr)	Potential (tons/yr)
Grinder 1, Rapid B-12	200	0.350	0.035	0.153
Grinder 2, Rapid B-12	200	0.350	0.035	0.153
Grinder 3, Rapid B-12	200	0.350	0.035	0.153
Grinder 4, Rapid B-12	200	0.350	0.035	0.153
Grinder 5, Rapid B-12	200	0.350	0.035	0.153
Grinder 6, Rapid B-12	200	0.350	0.035	0.153
Grinder 7, Rapid B-12	200	0.350	0.035	0.153
Grinder 8, Rapid B-12	200	0.350	0.035	0.153
Grinder 9, Cumberland 38B	2500	0.350	0.438	1.916
Grinder 10, Cumberland 38B	2500	0.350	0.438	1.916
Grinder 11, Cumberland 38B	2500	0.350	0.438	1.916
Grinder 12, Cumberland 38B	2500	0.350	0.438	1.916
Grinder 13, Cumberland 56T	700	0.350	0.123	0.537
Grinder 14, Cumberland 56T	700	0.350	0.123	0.537
Grinder 15, Cumberland 56T	700	0.350	0.123	0.537
Grinder 16, Cumberland 56T	700	0.350	0.123	0.537
Grinder 17, Cumberland 56T	700	0.350	0.123	0.537
Grinder 18, Cumberland 56T	700	0.350	0.123	0.537
Grinder 19, Cumberland 56T	700	0.350	0.123	0.537
Grinder 20, Cumberland 56T	700	0.350	0.123	0.537
Grinder 21, Cumberland 56T	700	0.350	0.123	0.537
Grinder 22, Cumberland 56T	700	0.350	0.123	0.537
Grinder 23, Cumberland 56T	700	0.350	0.123	0.537
Grinder 24, Cumberland 56T	700	0.350	0.123	0.537
Grinder 25, Cumberland 56T	700	0.350	0.123	0.537
Grinder 26, Cumberland 56T	700	0.350	0.123	0.537
Grinder 27, Cumberland 56T	700	0.350	0.123	0.537
Grinder 28, Cumberland 56T	700	0.350	0.123	0.537
Grinder 29, Cumberland 56T	700	0.350	0.123	0.537
Grinder 30, Cumberland 56T	700	0.350	0.123	0.537
Grinder 31, Cumberland 56T	700	0.350	0.123	0.537
Grinder 32, Cumberland 56T	700	0.350	0.123	0.537
Grinder 33, Cumberland 56T	700	0.350	0.123	0.537
Grinder 34, Cumberland 56T	700	0.350	0.123	0.537
Grinder 35, Cumberland 56T	700	0.350	0.123	0.537
Grinder 36, Cumberland 56T	700	0.350	0.123	0.537
Grinder 37, Cumberland 56T	700	0.350	0.123	0.537
Grinder 38, Cumberland 56T	700	0.350	0.123	0.537
Grinder 39, Cumberland 56T	700	0.350	0.123	0.537
Grinder 40, Cumberland 56T	700	0.350	0.123	0.537
Grinder 41, Cumberland 56T	700	0.350	0.123	0.537

Total Potential PM 24.45 tons per year

Emission Factors for grinding are from FIRE Version 6.22 for log sawing (SCC# 3-07-008-02).

Appendix A: Emissions Calculations
VOC Emissions
UV Printing

Company Name: C&M Fine Pack
Address City IN Zip: 7707 Vicksburg Pike, Fort Wayne IN 46804
Permit Number: 003-23606-00346
Plt ID: 003-00346
Reviewer: JH/EVP

THROUGHPUT	INK VOCS				
Press I.D.	Ink ID.	Maximum Ink Use/hour (Pounds)	Weight % Volatiles	Flash Off %	VOC Emissions (TONS/YEAR)
Printer 1 Printer 2 & Printer 3	Eastgate Graphics Inc. UV Printing Inks	45.66	0.1%	100.00%	0.20

Total VOC Emissions =	0.20
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METHODOLOGY

VOC = Weight percentage volatiles (water minus organics) * Flash off * Max Ink Use/year = Tons per Year

Weight % VOC in Ultraviolet Ink Specified in MSDS as less than .01%. .01% Voc assumption is worst case.

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

Company Name: C&M Fine Pack
Address City IN Zip: 7707 Vicksburg Pike, Fort Wayne IN 46804
Permit Number: 003-23606-00346
Plt ID: 003-00346
Reviewer: JH/EVP

ID #	Year	BTU Input
1	1992	100,000
2	1992	210,000
3	1992	350,000
4	1992	165,000
5	1992	144,000
6	1992	794,000
7	1992	794,000
8	1992	570,000
9	1992	907,000
10	1992	907,000
11	1992	2,019,600
12	1992	692,000
13	1992	692,000
14	1992	1,037,000
15	1992	325,000
16	1992	1,033,000
17	1992	1,836,000
18	1992	1,950,000
19	1992	1,950,000
20	1992	1,950,000
21	2001	400,000

ID #	Year	BTU Input
22	2001	200,000
23	2001	200,000
24	2001	25,000
25	2001	25,000
26	2001	25,000
27	2001	25,000
28	2001	400,000
29	2001	2,764,800
30	2001	2,160,000
31	2001	3,024,000
32	2001	2,073,600
33	2001	1,468,800
34	2005	3,421,000
35	2005	3,421,000
36	2005	3,421,000
37	2005	3,041,000
38	2005	1,616,000
39	2005	2,376,000
40	2005	3,326,000
41	2005	2,376,000
42	2005	1,331,000

Total Gas Load	55,545,800	BTU/Hour
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**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Boilers**

Company Name: C&M Fine Pack
Address City IN Zip: 7707 Vicksburg Pike, Fort Wayne IN 46804
Permit Number: 003-23606-00346
Plt ID: 003-00346
Reviewer: JH/EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
55.5	486.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	100.0	5.5	84.0
	0.46	1.85	0.15	24.33	1.34	20.44

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 See next page for HAPs emissions calculations.

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

Company Name: C&M Fine Pack
Address City IN Zip: 7707 Vicksburg Pike, Fort Wayne IN
Permit Number: 003-23606-00346
Pit ID: 003-00346
Reviewer: JH/EVP

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.1E-04	2.919E-04	0.02	0.44	8.272E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.216E-04	2.676E-04	3.406E-04	9.245E-05	5.109E-04

Total HAPs 0.46 tons per year

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
PM Emissions
Silo Storage**

Company Name: C&M Fine Pack
Address City IN: 7707 Vicksburg Pike, Fort Wayne IN
Zip: 46804
Permit Number: 003-23606-00346
Plt ID: 003-00346
Reviewer: JH/EVP

Equipment Name	Maximum Capacity (lbs/hr)	*Emission Factor (lb/ton)	Uncontrolled PTE of PM/PM10 (lbs/hr)	Uncontrolled PTE of PM/PM10 (tons/year)	Control Efficiency %	Controlled PTE of PM/PM10 (lb/hour)	Controlled PTE of PM/PM10 (tons/year)
Resin Silos	26000	0.8	10.4	45.55	99.5	0.052	1.00

Potential PM per silo (Lb/hr) 0.19 lbs/hr

PM/PM10 from silos controlled using bag house with 99.5% efficiency

Maximum Capacity based on extruder maximum capacity.
Emission Factor for AP-42, Chapter 6.62. Table 6.6.2-2.

Uncontrolled PTE (lbs/hr)= maximum capacity * emission factor / 2000
Uncontrolled PTE (tons/year)= uncontrolled PTE (lb/hr) * 8760 / 2000
Controlled PTE (tons/year)= Uncontrolled PTE (tons/year) * ((100-control efficiency)/100)
Potential PM per silo (lb/hr)=uncontrolled PTE of PM (lbs/hr) / 56 silos