



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 29, 2008

RE: Dolco Packaging / 001-24032-00032

FROM: Matthew Stuckey, 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



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**Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY**

**Dolco Packaging
2110 Patterson Street
Decatur, Indiana 46733**

(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.: F001-24032-00032	
Issued by: Origin signed by	Issuance Date: May 29, 2008
Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: May 29, 2013

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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 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 polystyrene extrusion plant.

Source Address:	2110 Patterson Street, Decatur, Indiana 46733
Mailing Address:	2110 Patterson Street, Decatur, Indiana 46733
General Source Phone Number:	(260) 728-2161
SIC Code:	3086
County Location:	Adams
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 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:

- (a) One (1) polystyrene food packaging production line consisting of the following:
 - (1) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions;
 - (2) One (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour, to control VOC emissions from thermoforming/molding and the curing room which were all constructed in 1972. The RTO is equipped with a prefilter which is downstream of the silo baghouses;
 - (3) Uncontrolled extrusion and final product storage operations, constructed in 1972, with maximum capacities included in a confidential file;
 - (4) Underpress grinders located under the thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse.
- (b) Eight (8) offset printers, constructed in 1972, with a combined estimated maximum ink usage of 28,000 pounds per year.

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) Paved and unpaved roads and parking lost with public access [326 IAC 6-4];

- (b) Enclosed systems for conveying plastic raw materials and plastic finished goods;
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (d) Gasoline generators not exceeding 110 horsepower;
- (e) Stationary fire pumps; and
- (f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons; and
 - (2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.

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)]

- (a) This permit, F001-24032-00032, 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 July 1 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) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (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, 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

- (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 F001-24032-00032 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 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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.15 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.16 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.17 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.

Stratospheric Ozone Protection

C.18 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:

- (a) One (1) polystyrene food packaging production line consisting of the following:
 - (1) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions;
 - (2) One (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour, to control VOC emissions from thermoforming/molding and the curing room which were all constructed in 1972. The RTO is equipped with a pre-filter which is downstream of the silo baghouses;
 - (3) Uncontrolled extrusion and final product storage operations, constructed in 1972, with maximum capacities included in a confidential file;
 - (4) Underpress grinders located under the thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse.
- (b) Eight (8) offset printers, constructed in 1972, with a combined estimated maximum ink usage of 28,000 pounds per year.

(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 FESOP Limits [326 IAC 2-8]

Pursuant to F001-7300-00032, issued April 14, 2001 and 326 IAC 2-8-4 (FESOP), the following apply:

- (a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed 476.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month such that the potential to emit of VOC from the polystyrene food packaging production line shall not exceed 89.38 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The Permittee shall operate the thermal oxidizer, with a minimum destruction efficiency of 97%, at all times that the thermoformers/molders, curing, and silos are in operation and at the following capture efficiencies: 84% for curing, 100% for the thermoforming underpress grinders, and 100% for the silos. The thermal oxidizer destruction and capture efficiencies together shall yield the following overall efficiencies: 81.48% for curing, 97% for the thermoforming underpress grinders, and 97% for the silos.
- (c) The PM10 emissions from the polystyrene food packaging production line shall be limited to less than 7.75 pounds per hour.

When combined with potential VOC emissions from the remainder of the source, compliance with paragraphs (a) and (b) limit source-wide VOC emissions to less than one hundred (100) tons per year. Compliance with paragraph (c) limits source-wide PM10 emissions to less than 100 tons per year. These limits render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable and will maintain this source as a minor source under 326 IAC 2-2 (PSD).

D.1.2 PSD Minor Limit [326 IAC 2-2]

The PM emissions from the polystyrene food packaging production line shall be limited to less than 56.8 pounds per hour.

Compliance with this limit will maintain this source as a minor source under 326 IAC 2-2 (PSD).

D.1.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations, shall be limited to a total of 7.75 pounds per hour when operating at a total process weight rate of 2.6 tons per hour. This limit was calculated by the following:

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:

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.5 Particulate Control

- (a) In order to comply with conditions D.1.1(c), D.1.2, and D.1.3, the nine (9) baghouses and RTO pre-filter for particulate control shall be in operation and control emissions from the polystyrene food packaging production line at all times that the polystyrene food packaging production line is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period no later than August 18, 2010, in order to demonstrate compliance with Condition D.1.1(b), the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be conducted on the thermal oxidizer to determine or verify the following capture efficiencies: 84% for curing, 100% for the thermoforming underpress grinders, and 100% for the silos. The test shall also verify a minimum destruction efficiency of 97% for the thermal oxidizer. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC limit in condition D.1.1(a) shall be determined as follows:

VOC Emissions (tons/year) = [Butane input (tons/year) x 0.0342 tons VOC/ton Butane input to roll stock storage (curing)] + [Butane input (tons/year) x 0.0063 tons VOC/ton Butane input to thermoforming underpress grinders] + [Butane input (tons/year) x 0.0003 tons VOC/ton Butane input to the silos] + [Butane input (tons/year) x 0.0374 tons VOC/ton Butane input to extrusion] + [Butane input (tons/year) x 0.0989 tons VOC/ton Butane input to finished product storage] + [Butane input (tons/year) x 20.83 tons resin/ton butane input x 0.000505 ton VOC (HAP)/ton resin]

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

D.1.8 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with condition D.1.1(a) and (b) as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.9 Parametric Monitoring

- (a) The Permittee shall determine the fan amperage from the most recent valid stack test that demonstrates compliance with condition D.1.1(a) and (b), as approved by IDEM.
- (b) The fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan amperage is outside the normal range of 41 to 43 hertz or the range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.10 Visible Emissions Notations

- (a) Visible emission notations of each of the baghouse stack exhausts shall be performed once per day during normal daylight operations when exhausting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.11 Parametric Monitoring

The Permittee shall record the pressure drop across pre-filter for the thermal oxidizer used in conjunction with the polystyrene food packaging production line, at least once per day when the process is in operation. When for any one reading, the pressure drop across the pre-filter is outside the normal range of 1.0 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.12 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.13 Record Keeping Requirement

- (a) To document compliance with Condition D.1.1(a), the Permittee shall maintain monthly records of the input of butane as a blowing agent to the polystyrene food packaging production line.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain the continuous temperature records (on an hourly average basis) for the regenerative thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliance stack test.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain daily records of the fan amperage.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain records of once per day visible emission notations of each of the baghouse stack exhausts when exhausting directly to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day or did not exhaust directly to the atmosphere).
- (e) To document compliance with Condition D.1.11, the Permittee shall maintain once per day records of the pressure drop across the pre-filter for the thermal oxidizer. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the address 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
FESOP Permit No.: F001-24032-00032

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: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
FESOP Permit No.: F001-24032-00032

This form consists of 2 pages

Page 1 of 2

- | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <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 Quarterly Report

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
FESOP Permit No.: F001-24032-00032
Facility: Polystyrene food packaging production line
Parameter: Butane blowing agent input
Limit: The input of butane as a blowing agent shall be less than 476.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Butane Input This Month (tons)	Butane Input Previous 11 Months (tons)	12 Month Total Butane Input (tons)
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: Dolco Packaging
 Source Address: 2110 Patterson Street, Decatur, Indiana 46733
 Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
 FESOP Permit No.: F001-24032-00032

Months: _____ **to** _____ **Year:** _____

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 "No deviations occurred this reporting period".	
<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

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: Dolco Packaging
Source Location: 2110 Patterson Street, Decatur, Indiana 46733
County: Adams
SIC Code: 3086
Operation Permit No.: F001-24032-00032
Permit Reviewer: ERG/TE

On April 16, 2008, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat, Decatur, Indiana, stating that Dolco Packaging had applied for a FESOP Renewal to continue to operate a polystyrene extrusion plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 5, 2008, Roger Lichtle of Dolco Packaging submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (additions in **bold**, deletions in ~~strikeout~~):

Comment 1

The second sentence of Paragraph D.1.11 should read "...the pressure drop across **the pre-filter** is outside the normal...".

Response 1

The condition has been corrected as follows:

D.1.11 Parametric Monitoring

The Permittee shall record the pressure drop across pre-filter for the thermal oxidizer used in conjunction with the polystyrene food packaging production line, at least once per day when the process is in operation. When for any one reading, the pressure drop across ~~any of the baghouses~~ **the pre-filter** is outside the normal range of 1.0 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

Comment 2

On page 2 of 4 of the Appendix A of the Technical Support Document, the calculation of VOC from inks is incorrect. 28,000 pounds of ink usage at 10% VOC content would give 2,800 pounds of VOC per year, or 1.4 tons. However, Dolco has largely made a shift to other types of ink in its manufacturing process that do not emit VOC during use, so that a maximum of 5,000 pounds of VOC-bearing inks at 10% VOC content is the correct usage. Therefore, the VOC emissions should be 0.25 ton per year from ink usage. Please make this correction.

Response 2

The maximum usage rate that was used in the original calculations in Appendix A was 10,000 pounds of VOC-bearing inks per year. However, the formula shown on the spreadsheet incorrectly showed 28,000 pounds per year which is the overall maximum ink usage including non-VOC inks. However, since Dolco Packaging submitted the above comment on the permit, the OAQ and Dolco Packaging have agreed that in order to ensure compliance with the source-wide VOC emission limit to comply with 326 IAC 2-8 (FESOP), it will be assumed that the maximum overall ink usage rate of 28,000 pounds per year will represent the maximum usage of VOC-bearing inks as a worst case scenario. Therefore, the emission calculations were revised to reflect the potential to emit of VOC from the eight (8) offset printers of 1.4 tons per year. The VOC limit in condition D.1.1 of the FESOP has been revised as follows to allow for the additional VOC emissions from the printers:

D.1.1 FESOP Limits [326 IAC 2-8]

Pursuant to F001-7300-00032, issued April 14, 2001 and 326 IAC 2-8-4 (FESOP), the following apply:

- (a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed ~~479~~ **476.6** tons per twelve (12) consecutive month period, with compliance determined at the end of each month such that the potential to emit of VOC from the polystyrene food packaging production line shall not exceed ~~89.9~~ **89.38** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The Permittee shall operate the thermal oxidizer, with a minimum destruction efficiency of 97%, at all times that the thermoformers/molders, curing, and silos are in operation and at the following capture efficiencies: 84% for curing, 100% for the thermoforming underpress grinders, and 100% for the silos. The thermal oxidizer destruction and capture efficiencies together shall yield the following overall efficiencies: 81.48% for curing, 97% for the thermoforming underpress grinders, and 97% for the silos.
- (c) The PM10 emissions from the polystyrene food packaging production line shall be limited to less than 7.75 pounds per hour.

When combined with potential VOC emissions from the remainder of the source, compliance with paragraphs (a) and (b) limit source-wide VOC emissions to less than one hundred (100) tons per year. Compliance with paragraph (c) limits source-wide PM10 emissions to less than 100 tons per year. These limits render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable and will maintain this source as a minor source under 326 IAC 2-2 (PSD).

The Quarterly Report form for reporting the butane usage has also been revised to reflect the revised butane usage limit.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Appendix A: Emission Calculations

Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Permit Number: F001-24032-00032
Plt ID: 001-00032
Reviewer: ERG/TE
Date: 05/16/08

Unrestricted Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Polystyrene Manufacturing Process	Thermal Oxidizer Combustion	Printing	TOTAL
PM	2,108.00	0.04	0.00	2,108.04
PM10	2,108.00	0.17	0.00	2,108.17
SO2	0.00	0.01	0.00	0.01
NOx	0.00	2.19	0.00	2.19
VOC	261.66	0.12	10.40	272.18
CO	0.00	1.84	0.00	1.84
total HAPs	5.01	0.04	Negl.	5.06
worst case single HAP	(Styrene) 4.67	(Hexane) 0.04	Negl.	(Styrene) 4.67
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Polystyrene Manufacturing Process	Thermal Oxidizer Combustion	Printing	TOTAL
PM	21.08	0.04	0.00	21.13
PM10	21.08	0.17	0.00	21.25
SO2	0.00	0.01	0.00	0.01
NOx	0.00	2.19	0.00	2.19
VOC	89.38	0.12	10.40	99.90
CO	0.00	1.84	0.00	1.84
total HAPs	5.01	0.04	Negl.	5.06
worst case single HAP	(Styrene) 4.67	(Hexane) 0.04	Negl.	(Styrene) 4.67
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emission Calculations

Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Permit Number: F001-24032-00032
Plt ID: 001-00032
Reviewer: ERG/TE
Date: 05/16/08

Polystyrene Manufacturing

Limit of material usage before control:

Polystyrene Maximum Allowable Usage = 16783.00 tons/yr
 Butane Maximum Allowable Usage = 476.60 tons/yr
 Maximum Resin Usage = 9929.17 tons/yr

Emitted Into:	Gas Allocation Percentage	Limited Tons per year VOC in this area Before Control	Percent Capture	Percent Destruction Efficiency of TO	Tons Per Year VOC Destroyed	Tons Per Year VOC Emitted
Roll Stock Storage	18.46%	87.98	84.0%	97.0%	71.69	16.29
Thermoforming	20.88%	99.51	100.0%	97.0%	96.53	2.99
Silos	0.88%	4.19	100.0%	97.0%	4.07	0.13
Extrusion	3.74%	17.82	0.0%	0.0%	0.00	17.82
Finished Product Storage	9.89%	47.14	0.0%	0.0%	0.00	47.14
Retained in Product	46.15%	219.95	0.0%	0.0%	0.00	0.00
Limited VOC Emissions from Butane Before Control:						256.65

Stays in Product

Total Limited VOC Emissions from Butane After Control: 84.37 tons/yr

Methodology:

Tons per year VOC in each area = Butane Usage (tons/yr) x Gas Allocation Percentage (%)
 Tons Per Year VOC Destroyed = Tons Per Year VOC in each area x Percent Capture Efficiency (%) x Percent Destruction Efficiency (%)
 Tons Per Year VOC Emitted = Tons Per Year VOC in each area - Tons Per Year VOC Destroyed

HAP Emissions:

HAP	Emission Factor (lb/lb resin)	Emissions (tons/yr)
Styrene	0.000443	4.40
Ethyl Benzene	0.000062	0.62
Total HAP Emissions		5.01 tons/yr

Methodology:

HAP Emission factors were obtained from previous permits issued to this source.
 HAP Emissions (tons/yr) = HAP Emission factor (lb/lb) x Resin Usage (tons/yr) x 2000 lbs/ton x 1/2000 lbs/ton

Total Limited VOC Emissions After Control:
 Total Emissions from Butane After Control: **84.37**
 Total Emissions from HAPs that are also VOC: **5.01**
Total VOC: 89.38

PM Emissions:

Baghouse Control Efficiency: 99%

$$\text{Baghouse Controlled Emissions} = (2400 \text{ acfm}) * (0.026 \text{ gr/acf}) * (60 \text{ min/hr}) * (\text{lb}/7000 \text{ grains}) * (8,760 \text{ hrs/yr}) * (\text{ton}/2000 \text{ lbs}) * (9 \text{ baghouses}) = \mathbf{21.1 \text{ tons/yr}}$$

$$\text{Uncontrolled Emissions} = (\text{Controlled Emissions}) / (1-0.99) = \mathbf{2108 \text{ tons/yr}}$$

Eight (8) Offset Printers

Note: It is assumed that all VOC from the ink is emitted as a worst case scenario.

$$\text{Ink VOC emissions} = (28,000 \text{ lb VOC containing ink/yr}) * (10\% \text{ VOC}) * (\text{ton}/2000 \text{ lb}) = \mathbf{1.4 \text{ tons/yr}}$$

$$\text{Crystal Clean Solvent VOC emissions} = (2.48 \text{ lb crystal clean/hr}) * (83\% \text{ VOC}) * (8760 \text{ hr/yr}) * (\text{ton}/2000 \text{ lb}) = \mathbf{9.0 \text{ tons/yr}}$$

Methodology: Emissions = usage rate, lb/hr * % VOC by wt * 8760 hr/yr * ton/2000 lb

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Thermal Oxidizer

Company Name: Dolco Packaging

Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733

Permit Number: F001-24032-00032

Pit ID: 001-00032

Reviewer: ERG/TE

Date: 05/16/08

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.000

43.800

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.17	0.01	2.19	0.12	1.84

*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

Thermal Oxidizer

HAPs Emissions

Company Name: Dolco Packaging

Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733

Permit Number: F001-24032-00032

Pit ID: 001-00032

Reviewer: ERG/TE

Date: 05/16/08

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05	0.04

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.

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

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

Source Background and Description

Source Name:	Dolco Packaging
Source Location:	2110 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3086
Permit Renewal No.:	F001-24032-00032
Permit Reviewer:	ERG/TE

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Dolco Packaging relating to the operation of a polystyrene extrusion plant.

History

On December 5, 2006, Dolco Packaging submitted an application to the OAQ requesting to renew its operating permit. Dolco Packaging was issued its first FESOP Renewal on September 11, 2002.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) polystyrene food packaging production line consisting of the following:
 - (1) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions;
 - (2) One (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour, to control VOC emissions from thermoforming/molding and the curing room which were all constructed in 1972. The RTO is equipped with a pre-filter which is downstream of the silo baghouses;
 - (3) Uncontrolled extrusion and final product storage operations, constructed in 1972, with maximum capacities included in a confidential file;
 - (4) Underpress grinders located under the thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse.
- (b) Eight (8) offset printers, constructed in 1972, with a combined estimated maximum ink usage of 28,000 pounds per year.

Insignificant Activities

- (a) Paved and unpaved roads and parking lost with public access [326 IAC 6-4];
- (b) Enclosed systems for conveying plastic raw materials and plastic finished goods;
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

- (d) Gasoline generators not exceeding 110 horsepower;
- (e) Stationary fire pumps; and
- (f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons; and
 - (2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.

Existing Approvals

Since the issuance of the FESOP Renewal No. F001-14652-00032 on September 11, 2002, the source has constructed or has been operating under the following approval:

Administrative Amendment No. 001-16635-00032 issued on October 30, 2002.

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 registrations and permits are superseded by this permit.

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

- (a) FESOP Renewal No. F001-14652-00032, Condition D.1.1

The polystyrene usage limit included in condition D.1.1 has been removed from this FESOP Renewal because it is not directly related to the VOC emission limit. VOC emissions originate from the butane blowing agent that is used. In order to make the butane input limit an enforceable limit on VOC emissions, a formula was added to a condition in the Compliance Determination Requirements section to calculate VOC emissions from butane usage taking into account the control of VOC emissions by the thermal oxidizer.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 4).

County Attainment Status

The source is located in Adams County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) Adams County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x 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.
- (c) Adams 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) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	2,108
PM-10	2,108
SO ₂	0.01
VOC	272.6
CO	1.84
NO _x	2.19

HAPs	tons/year
Styrene	4.42
Ethyl Benzene	0.62
Hexane	0.04
Total	5.08

Note: The total HAP emissions above also include negligible amounts of other HAPs from combustion not shown in the table.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and VOC are 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 PM10 and 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 all other criteria pollutants are 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.

Fugitive Emissions

Since this type of operation is not in 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

No previous emission data has been received from the source.

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)							Single HAP	Total HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x			
Polystyrene food packaging production line (controlled silos, thermoforming/molding, and curing room; uncontrolled extrusion and product storage)	21.1	21.1	0.0	89.83	0.0	0.0	4.42	5.04	
Thermal Oxidizer Combustion	0.04	0.17	0.01	0.12	1.84	2.19	0.04	0.04	
Printing	0.0	0.0	0.0	9.50	0.0	0.0	Negl.	Negl.	
Insignificant Activities	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	
Total Emissions	21.14	21.27	0.01	99.45	1.84	2.19	4.42	5.08	

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit renewal for this source.
- (b) The insignificant storage tanks are not subject to the NSPS, 40 CFR Part 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) because each storage tank has a capacity of less than 75 cubic meters.
- (c) 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 (PSD)

The polystyrene food packaging production line, including the nine (9) silos, thermoforming/molding, the curing room, and extrusion and final product storage operations, and the eight (8) printers were all constructed in 1972 and pre-date 326 IAC 2-2 (Prevention of Significant Deterioration). The addition of the butane compressed gas storage tank in 1990 and the thermal oxidizer in 1998 were not major modifications under this rule and the source remained a minor source under this rule. As shown in the Potential to Emit After Issuance table, the allowable emissions of all attainment regulated pollutants are less than 100 tons per year after application of all federally enforceable emission limits (see 326 IAC 2-8-4 (FESOP) discussion below). The PM10 and VOC limits discussed below under 326 IAC 2-8 limit PM10 and VOC emissions to less than 250 tons per year each and make the source a minor source under 326 IAC 2-2 (PSD).

The unrestricted potential emissions of PM are greater than 250 tons per year. The source shall limit PM emissions as follows:

The PM emissions from the polystyrene food packaging production line shall be limited to less than 56.8 pounds per hour. Compliance with this limit will limit source wide PM emissions to less than 250 tons per year and will maintain the source as a minor source under 326 IAC 2-2 (PSD).

326 IAC 2-4.1-1 (New Source Toxics Control)

The operation of this source emits less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6-3 and 2-6-4 because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Pursuant to 326 IAC 2-6-5, this source is only required to report actual emissions if requested by IDEM.

326 IAC 2-8 (FESOP)

The unrestricted potential emissions of volatile organic compounds (VOC) are greater than 100 tons per year. The source shall limit VOC emissions as follows:

- (a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed 479 tons per twelve (12) consecutive month period, with compliance determined at the end of each month such that the potential to emit of VOC from the polystyrene food packaging production line shall not exceed 89.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The Permittee shall operate the thermal oxidizer, with a minimum destruction efficiency of 97%, at all times that the thermoformers/molders, curing, and silos are in operation and at the following capture efficiencies: 84% for curing, 100% for the thermoforming underpress grinders, and 100% for the silos. The thermal oxidizer destruction and capture efficiencies together shall yield the following overall efficiencies: 81.48% for curing, 97% for the thermoforming underpress grinders, and 97% for the silos.

These limits, when combined with potential VOC emissions from the remainder of the source, limit source-wide VOC emissions to less than one hundred (100) tons per year. Therefore the requirements of 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

The unrestricted potential emissions of PM10 are greater than 100 tons per year. The source shall limit PM10 emissions as follows:

The PM10 emissions from the polystyrene food packaging production line shall be limited to less than 7.75 pounds per hour. Compliance with this limit will limit source wide PM10 emissions to less than 100 tons per year and will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) 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 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to this rule because the fugitive particulate matter emissions from the paved and unpaved roadways are negligible. There are no other sources of fugitive particulate matter emissions at this source.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations, shall be limited to a total of 7.75 pounds per hour when operating at a total process weight rate of 2.6 tons per hour. This limit was calculated by the following:

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:

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

The nine (9) baghouses and RTO pre-filter shall be in operation at all times the polystyrene food packaging production line is in operation, in order to comply with this limit.

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

- (a) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the polystyrene food packaging production line even though it has the potential to emit greater than twenty-five (25) tons per year of VOC because it was constructed prior to the applicability date of the rule, January 1, 1980.
- (b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the eight (8) offset printers because they do not have the potential to emit greater than twenty-five (25) tons per year of VOC and they were constructed prior to the applicability date of the rule, January 1, 1980.

326 IAC 8-2 (Surface Coating Emission Limitations)

326 IAC 8-2 (Surface Coating Emission Limitations) does not apply to this source because this source is located in Adams County, was constructed prior to 1980, and is limiting the potential to emit of VOC to less than one hundred (100) tons per year.

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

326 IAC 8-5-5 (Graphic Arts Operations) is not applicable to this source because the source is located in Adams County and was constructed and modified prior to the applicability date of the rule, November 1, 1980.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 (Organic Solvent Emission Limitations) is not applicable to this source because the source is located in Adams County, was constructed and modified prior to October 7, 1974, and is limiting VOC emissions to below one hundred (100) tons per year.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) does not apply to this source because the source is located in Adams County.

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

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) is not applicable to this source because it is located in Adams County. This rule only applies to storage vessels in Clark, Floyd, Lake or Porter County.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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.

The compliance determination requirements applicable to this source are as follows:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Polystyrene food packaging production line	Thermal Oxidizer	No later than August 18, 2010	VOC	Once every 5 years	The thermal oxidizer shall operate at a minimum destruction efficiency of 97% and at the following capture efficiencies: 84% for curing, 100% for thermoforming underpress grinders, and 100% for the silos.

Testing is not required for the nine (9) baghouses for the nine (9) silos because they do not meet the criteria requiring a stack test.

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Thermal Oxidizer	Temperature	Continuous	At or above 1400°F	Response Steps
	Fan Amperage	Daily	41 to 43 hertz	
RTO Pre-filter	Water Pressure Drop	Daily	1.0 to 3.0 inches	Response Steps
	Visible Emissions	Daily	Normal-Abnormal	

Note: The pressure drop is required to be monitored for the pre-filter for the thermal oxidizer instead of for the nine silo baghouses because, as determined in the previous FESOP Renewal (F001-14652-00032) issued on September 11, 2002, the silo baghouses have no fan and therefore the pressure drop would always be zero. The nine silo baghouses vent to the oxidizer pre-filter and then to the oxidizer. Monitoring of the oxidizer pre-filter would be more appropriate to indicate possible problems.

These monitoring conditions are necessary because the thermal oxidizer for the polystyrene food packaging production line must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and to render the requirements of 326 IAC 2-2 (PSD) not applicable. Also, the nine (9) baghouses for the nine (9) silos which vent to the oxidizer pre-filter and the oxidizer pre-filter must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP) and to render the requirements of 326 IAC 2-2 (PSD) not applicable.

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 December 5, 2006.

Conclusion

The operation of this polystyrene extrusion plant shall be subject to the conditions of the attached FESOP Renewal No. F001-24032-00032.

Appendix A: Emission Calculations

Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Permit Number: F001-24032-00032
Plt ID: 001-00032
Reviewer: ERG/TE
Date: 12/27/07

Unrestricted Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Polystyrene Manufacturing Process	Thermal Oxidizer Combustion	Printing	TOTAL
PM	2,108.00	0.04	0.00	2,108.04
PM10	2,108.00	0.17	0.00	2,108.17
SO2	0.00	0.01	0.00	0.01
NOx	0.00	2.19	0.00	2.19
VOC	262.98	0.12	9.50	272.60
CO	0.00	1.84	0.00	1.84
total HAPs	5.04	0.04	Negl.	5.08
worst case single HAP	(Styrene) 4.67	(Hexane) 0.04	Negl.	(Styrene) 4.67
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Polystyrene Manufacturing Process	Thermal Oxidizer Combustion	Printing	TOTAL
PM	21.08	0.04	0.00	21.13
PM10	21.08	0.17	0.00	21.25
SO2	0.00	0.01	0.00	0.01
NOx	0.00	2.19	0.00	2.19
VOC	89.83	0.12	9.50	99.45
CO	0.00	1.84	0.00	1.84
total HAPs	5.04	0.04	Negl.	5.08
worst case single HAP	(Styrene) 4.67	(Hexane) 0.04	Negl.	(Styrene) 4.67
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emission Calculations

Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Permit Number: F001-24032-00032
Plt ID: 001-00032
Reviewer: ERG/TE
Date: 12/27/07

Polystyrene Manufacturing

Limit of material usage before control:

Polystyrene Maximum Allowable Usage = 16783.00 tons/yr
 Butane Maximum Allowable Usage = 479.00 tons/yr
 Maximum Resin Usage = 9979.17 tons/yr

Emitted Into:	Gas Allocation Percentage	Limited Tons per year VOC in this area Before Control	Percent Capture	Percent Destruction Efficiency of TO	Tons Per Year VOC Destroyed	Tons Per Year VOC Emitted
Roll Stock Storage	18.46%	88.42	84.0%	97.0%	72.05	16.38
Thermoforming	20.88%	100.02	100.0%	97.0%	97.01	3.00
Silos	0.88%	4.22	100.0%	97.0%	4.09	0.13
Extrusion	3.74%	17.91	0.0%	0.0%	0.00	17.91
Finished Product Storage	9.89%	47.37	0.0%	0.0%	0.00	47.37
Retained in Product	46.15%	221.06	0.0%	0.0%	0.00	0.00
Limited VOC Emissions from Butane Before Control:						257.94

Stays in Product

Total Limited VOC Emissions from Butane After Control: 84.79 tons/yr

Methodology:

Tons per year VOC in each area = Butane Usage (tons/yr) x Gas Allocation Percentage (%)
 Tons Per Year VOC Destroyed = Tons Per Year VOC in each area x Percent Capture Efficiency (%) x Percent Destruction Efficiency (%)
 Tons Per Year VOC Emitted = Tons Per Year VOC in each area - Tons Per Year VOC Destroyed

HAP Emissions:

HAP	Emission Factor (lb/lb resin)	Emissions (tons/yr)
Styrene	0.000443	4.42
Ethyl Benzene	0.000062	0.62
Total HAP Emissions		5.04 tons/yr

Methodology:

HAP Emission factors were obtained from previous permits issued to this source.
 HAP Emissions (tons/yr) = HAP Emission factor (lb/lb) x Resin Usage (tons/yr) x 2000 lbs/ton x 1/2000 lbs/ton

Total Limited VOC Emissions After Control:
 Total Emissions from Butane After Control: **84.79**
 Total Emissions from HAPs that are also VOC: **5.04**
Total VOC: 89.83

PM Emissions:

Baghouse Control Efficiency: 99%

$$\text{Baghouse Controlled Emissions} = (2400 \text{ acfm}) * (0.026 \text{ gr/acf}) * (60 \text{ min/hr}) * (\text{lb}/7000 \text{ grains}) * (8,760 \text{ hrs/yr}) * (\text{ton}/2000 \text{ lbs}) * (9 \text{ baghouses}) = \mathbf{21.1 \text{ tons/yr}}$$

$$\text{Uncontrolled Emissions} = (\text{Controlled Emissions}) / (1-0.99) = \mathbf{2108 \text{ tons/yr}}$$

Eight (8) Offset Printers

Note: It is assumed that all VOC from the ink is emitted as a worst case scenario.

$$\text{Ink VOC emissions} = (28,000 \text{ lb ink/yr}) * (10\% \text{ VOC}) * (\text{ton}/2000 \text{ lb}) = \mathbf{0.5 \text{ tons/yr}}$$

$$\text{Crystal Clean Solvent VOC emissions} = (2.48 \text{ lb crystal clean/hr}) * (83\% \text{ VOC}) * (8760 \text{ hr/yr}) * (\text{ton}/2000 \text{ lb}) = \mathbf{9.0 \text{ tons/yr}}$$

Methodology: Emissions = usage rate, lb/hr * % VOC by wt * 8760 hr/yr * ton/2000 lb

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Thermal Oxidizer

Company Name: Dolco Packaging

Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733

Permit Number: F001-24032-00032

Plt ID: 001-00032

Reviewer: ERG/TE

Date: 12/27/07

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.000

43.800

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.17	0.01	2.19	0.12	1.84

*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

Thermal Oxidizer

HAPs Emissions

Company Name: Dolco Packaging

Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733

Permit Number: F001-24032-00032

Pit ID: 001-00032

Reviewer: ERG/TE

Date: 12/27/07

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

HAPs - Metals						Total HAPs
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	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05	0.04

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.