



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: June 10, 2009

RE: Colorcon / 097-24999-00114

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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Mr. Dave Powers
Colorcon, Inc.
3702 E 21st St
Indianapolis, IN 46218

June 10, 2009

Re: Exempt Operation Status,
097-24999-00114

Dear Mr. Powers:

The application from Colorcon, Inc., received on July 3, 2007, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary pharmaceutical starch and coatings preparation plant located at 3702 East 21st Street, Indianapolis, IN 46218, is classified as exempt from air pollution permit requirements:

- (a) One (1) custom starch plant, identified as Plant 1, consisting of two (2) lines, identified as Plant 1E and Plant 1W, with one (1) storage silo, one (1) feed hopper, one (1) mill, one (1) dryer, (1) pellet tank, one (1) grinder, one (1) blending and screening unit, each, and one (1) final product hopper, and one (1) final product blender, all constructed in 1970, with a maximum capacity of 1,500 kg/hour, using integral baghouses for pneumatic conveying of starch throughout the plant, and exhausting to stack S-1-1;
- (b) One (1) custom starch plant, identified as Plant 2, consisting of one (1) line with one (1) storage silo, one (1) hopper, one (1) mill, and one (1) dryer, constructed in 1995, with a maximum capacity of 750 kg/hour, using integral baghouses for pneumatic conveying of starch throughout the plant, and exhausting to stack S-1-8;
- (c) One (1) custom coatings plant, identified as Coating Line, consisting of one (1) mixing operation, and one (1) coating processing operation, constructed in January, 2002, with a maximum capacity of 10,000 kg/week, uncontrolled and exhausting inside the building;
- (d) One (1) house vacuum system used for the collection of settled material, identified as emission unit HV-2, constructed in 1979, controlled by filter cartridges, and exhausting inside the building;
- (e) One (1) general dust collection system used for local exhaust ventilation throughout the facility and consisting of approximately 12 collection points, constructed in 1979, equipped with a Torit Dust Collector, identified as GDC-1, and exhausting to stack S-GDC-1;
- (f) One (1) natural gas boiler for building 1, identified as Boiler 1-1, constructed in 1985, with a maximum capacity of two and five tenths (2.5) MMBtu per hour, exhausting to stack S-1-13;
- (g) One (1) natural gas boiler for building 1, identified as Boiler 1-2, constructed in 2007, with a maximum capacity of two and eight tenths (2.8) MMBtu per hour, exhausting to stack S-1-14;
- (h) One (1) natural gas boiler for building 2, identified as Boiler 2, constructed in 2002, with a maximum capacity of two and one tenth (2.1) MMBtu per hour, exhausting to stack S-2-2;

- (i) One (1) natural gas boiler for building 3, identified as Boiler 3, constructed in 2002, with a maximum capacity of two and fifteen hundredths (2.15) MMBtu per hour, exhausting to stack S-3-1;
- (j) One (1) natural gas-fired emergency generator used for back-up power in building 2, identified as EGEN-2, constructed in 2002, with a maximum capacity of thirty-nine (39) kW of electric output, and exhausting to stack S-2-3;
- (k) One (1) Lab Hood, identified as LH-1-1, installed in 2006, exhausting to stack S-1-15;
- (l) Two (2) Lab Hoods, identified as LH-2-1 and LH-3-1, each installed in 2002, and exhausting to stacks S-2-4 and S-3-2, consecutively;
- (m) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP as defined under Section 112(b) of the Clean Air Act, including:
 - (1) Four (4), fifty-five (55) gallon drums for the storage of ammonia.
- (n) Activities related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities would not be associated with any commercial production process, including the following:
 - (1) Brazing, soldering, or welding operations and associated equipment; and
- (o) Activities performed using hand-held equipment, including the following:
 - (1) Cutting, excluding cutting torches;
 - (2) Drilling;
 - (3) Sanding;
 - (4) Sawing; and
 - (5) Surface grinding.

The following conditions shall be applicable:

1. 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 this permit:
 - (a) Opacity shall not exceed an average of thirty percent (30%) 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.
2. 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
3. 326 IAC 6-3-2 (Particulate Emission Limitations, work practices, and control technologies)
The Plant 1 and Plant 2 baghouses have been determined an integral part of each of the three (3) starch lines; therefore, particulate from each of the three (3) starch lines shall be controlled by the Plant 1 and Plant 2 baghouses at all times that each of the three (3) starch lines are in operation.

4. 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the four (4) boilers, identified as emission units B-1-1, B-1-2, B-2-1, and B-3-1, each, shall not exceed six tenths (0.6) pounds per MMBtu heat input.

A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Ms. Hannah Desrosiers, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/hd

cc: File - Marion County
Marion County Health Department
Compliance and Enforcement Branch
Billing, Licensing, and Training Section

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Construction Permit Transitioning to an Exemption

Source Description and Location

Source Name: Colorcon, Inc.
Source Location: 3702 East 21st Street, Indianapolis, Indiana 46218
County: Marion
SIC Code: 2046
Exemption No.: 097-24999-00114
Permit Reviewer: Hannah L. Desrosiers

On July 3, 2007, the Office of Air Quality (OAQ) received an application from Colorcon, Inc., related to the transition of a Construction Permit to an Exemption at a stationary pharmaceutical starch and coatings preparation plant.

Existing Approvals

The source has been operating under Construction Permit CP 097-0114-01, issued on March 12, 1998. Due to this application, the source is transitioning from a Construction Permit to an Exemption.

County Attainment Status

The source is located in Marion County. The following attainment status designations are applicable to Marion County:

Pollutant	Designation
PM10	Unclassifiable effective November 15, 1990.
PM2.5	Basic Nonattainment effective April 5, 2005 for PM2.5.
SO2	Better than national standards.
NO2	Cannot be classified or better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O3	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (2) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO2, NO2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD applicability.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Colorcon, Inc. on July 3, 2007, related to the transition of a Construction Permit to an Exemption at a pharmaceutical preparation plant.

The source consists of the following existing emission units:

- (a) One (1) custom starch plant, identified as Plant 1, consisting of two (2) lines, identified as Plant 1E and Plant 1W, with one (1) storage silo, one (1) feed hopper, one (1) mill, one (1) dryer, (1) pellet tank, one (1) grinder, one (1) blending and screening unit, each, and one (1) final product hopper, and one (1) final product blender, all constructed in 1970, with a maximum capacity of 1,500 kg/hour, using integral baghouses for pneumatic conveying of starch throughout the plant, and exhausting to stack S-1-1;

- (b) One (1) custom starch plant, identified as Plant 2, consisting of one (1) line with one (1) storage silo, one (1) hopper, one (1) mill, and one (1) dryer, constructed in 1995, with a maximum capacity of 750 kg/hour, using integral baghouses for pneumatic conveying of starch throughout the plant, and exhausting to stack S-1-8;
- (c) One (1) custom coatings plant, identified as Coating Line, consisting of one (1) mixing operation, and one (1) coating processing operation, constructed in January, 2002, with a maximum capacity of 10,000 kg/week, uncontrolled and exhausting inside the building;
- (d) One (1) house vacuum system used for the collection of settled material, identified as emission unit HV-2, constructed in 1979, controlled by filter cartridges, and exhausting inside the building;
- (e) One (1) general dust collection system used for local exhaust ventilation throughout the facility and consisting of approximately 12 collection points, constructed in 1979, equipped with a Torit Dust Collector, identified as GDC-1, and exhausting to stack S-GDC-1;
- (f) One (1) natural gas boiler for building 1, identified as Boiler 1-1, constructed in 1985, with a maximum capacity of two and five tenths (2.5) MMBtu per hour, exhausting to stack S-1-13;
- (g) One (1) natural gas boiler for building 1, identified as Boiler 1-2, constructed in 2007, with a maximum capacity of two and eight tenths (2.8) MMBtu per hour, exhausting to stack S-1-14;
- (h) One (1) natural gas boiler for building 2, identified as Boiler 2, constructed in 2002, with a maximum capacity of two and one tenth (2.1) MMBtu per hour, exhausting to stack S-2-2;
- (i) One (1) natural gas boiler for building 3, identified as Boiler 3, constructed in 2002, with a maximum capacity of two and fifteen hundredths (2.15) MMBtu per hour, exhausting to stack S-3-1;
- (j) One (1) natural gas-fired emergency generator used for back-up power in building 2, identified as EGEN-2, constructed in 2002, with a maximum capacity of thirty-nine (39) kW of electric output, and exhausting to stack S-2-3;
- (k) One (1) Lab Hood, identified as LH-1-1, installed in 2006, exhausting to stack S-1-15;
- (l) Two (2) Lab Hoods, identified as LH-2-1 and LH-3-1, each installed in 2002, and exhausting to stacks S-2-4 and S-3-2, consecutively;
- (m) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP as defined under Section 112(b) of the Clean Air Act, including:
 - (1) Four (4), fifty-five (55) gallon drums for the storage of ammonia.
- (n) Activities related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities would not be associated with any commercial production process, including the following:
 - (1) Brazing, soldering, or welding operations and associated equipment; and
- (o) Activities performed using hand-held equipment, including the following:
 - (1) Cutting, excluding cutting torches;
 - (2) Drilling;
 - (3) Sanding;
 - (4) Sawing; and
 - (5) Surface grinding.

“Integral Part of the Process” Determination

- (a) An "integral to process" determination was conducted and approved for each of the Plant 2 baghouses during the review for Construction and Operation Permit No. 097-0114-01 issued March 12, 1998.

IDEM determined that the Plant 2 baghouses were an integral part of the custom starch and coating lines because they pneumatically convey material throughout each step of the process, allowing the grinder to properly size material, and removing excess dust to maintain homogeneity, and safety. For additional information, see page 1 of the Technical Support Document prepared for Construction and Operation Permit No. 097-0114-01 issued March 12, 1998.

- (b) With this Exemption application, the Permittee has submitted a request that each of the Plant 1 baghouses be considered an integral part of each of the two (2) Plant 1 custom starch lines, as applicable.

Based on data submitted by the source, and as previously determined for each of the Plant 2 baghouses, each of the Plant 1 baghouses satisfies the requirements for the "integral to process" determination, as follows: Since the starch is pneumatically conveyed and the captured starch is further processed, it is clear that each of the two (2) custom starch line's processes cannot operate without the control equipment, each of the control devices serves a primary purpose other than pollution control since they would be used to move the starch through each line, irregardless, and finally the use of the control equipment has an overwhelming positive net economic effect on the operations of the source.

Therefore, IDEM OAQ agrees that each of Plant 1's two (2) custom starch line's baghouses should be considered an integral part of its corresponding custom starch line. Therefore, the permitting level will be determined using the potential to emit after the each of the Plant 1 baghouses. Operating conditions in the proposed permit will specify that each of the Plant 1 baghouses shall operate at all times when the corresponding custom starch line is in operation.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

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Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Three (3) Starch Lines	0.66	0.66	0.66	0	0	0	0	0	0
Coating Line	0.03	0.02	0.02	0	0	0	0	0	0
Boilers (mult)	0.08	0.32	0.24	0.03	4.20	0.23	3.53	0.079	0.076 Hexane
Bld 2 Emergency Electric Generator	0.002	0.007	0.005	0.001	0.090	0.005	0.075	0.002	0.002 Hexane
Total PTE of Entire Source	0.77	1.00	0.92	0.03	4.29	0.24	3.61	0.081	0.077 Hexane
Exemptions Levels	5	5	5	10	10	10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in this renewal, because the four (4) boilers, identified as emission units B-1-1, B-1-2, B-2-1, and B-3-1, rated at nine and six tenths (9.6) million British thermal units per hour, combined, each have maximum design heat input capacities of less than the applicability threshold of ten (10) million British thermal units per hour.
- (b) The Four (4), fifty-five (55) gallon drums for the storage of ammonia, are each not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels". Although each fifty-five (55) gallon drum for the storage of ammonia, was installed after July 23, 1984, each has a maximum capacity less than 75 m³ (19,813 gallons). Therefore, pursuant to 40 CFR 60.110b(a), the fifty-five (55) gallon ammonia storage drums are each exempt from the rule and the requirements are not included in this exemption.
- (c) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in this exemption.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of 40 CFR 63, Subpart T (63.460 through 63.470), NESHAP for Halogenated Solvent Cleaning and 326 IAC 20-6, are not included in this exemption because this source does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Containers, 40 CFR 63, Subpart PP (326 IAC 20), are not included in this exemption, since this source is not subject to any subpart of 40 CFR parts 60, 61, or 63.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Pharmaceuticals Production, 40 CFR 63.1250, Subpart GGG (326 IAC 20-57-1), are not included in this exemption, since the source is not a major source of HAPs, and produces a product that does not meet the definition of a pharmaceutical product, as defined in §63.1251.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Cellulose Products Manufacturing, 40 CFR 63, Subpart UUUU (326 IAC 20), are not included in this exemption, since this source is not a major source of HAPs, and does not engage in cellulose products manufacturing, as defined in §63.5485.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20), are not included in this exemption, since this source is not a major source of HAPs.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this exemption.

Compliance Assurance Monitoring (CAM)

- (g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-1.1-5 (Non-attainment New Source Review)
This source is not major under non-attainment NSR because it has the potential to emit less than 100 tons of PM_{2.5} and SO₂. Therefore, the Non-attainment New Source Review requirements are not applicable.
- (c) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major source. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Additionally, this source is not one (1) of the twenty-eight (28) listed source categories. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and

it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(f) 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 this permit:

- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) 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.

(g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

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

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than twenty-five (25) tons per year. Therefore, 326 IAC 6-5 does not apply.

(i) 326 IAC 6.5 (Nonattainment Area Particulate Matter Limitations - Except Lake County)

The source is not subject to the requirements of 326 IAC 6.5, because the source's potential to emit PM, PM10 and PM2.5 are each less than one hundred (100) tons per year, and the actual particulate emissions of PM, PM10 and PM2.5 are each less than ten (10) tons per year. Therefore, 326 IAC 6.5 does not apply.

(j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

(k) 326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

(l) 326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

Three (3) Starch Lines

(m) 326 IAC 6-3-2 (Particulate Emission Limitations, work practices, and control technologies)

An "integral to process" determination was conducted and approved for each of the Plant 2 baghouses during the review for Construction and Operation Permit No. 097-0114-01 issued March 12, 1998. Additionally, during the review for this MSOP application, IDEM has determined that each of the Plant 1 baghouses be considered an integral part of each of the two (2) Plant 1 custom starch lines. The Plant 1 and Plant 2 baghouses are each used to pneumatically convey the starch through each accompanying starch line where the captured starch is further processed, and then packaged for shipping. Without the baghouse systems, the starch cannot be moved through each custom starch line. Thus, emissions from each of the starch lines are calculated after consideration of their respective control devices. The three (3) starch lines, combined, have potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the three (3) starch lines are exempt from the

requirements of 326 IAC 6-3.

Since the Plant 1 and Plant 2 baghouses have been determined an integral part of each of the three (3) starch lines, particulate from each of the three (3) starch lines shall be controlled by the Plant 1 and Plant 2 baghouses at all times that each of the three (3) starch lines are in operation.

Coating Line

- (n) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the Coating Line is exempt from the requirements of 326 IAC 6-3, because the uncontrolled potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) are not included in this exemption.

Boilers

- (o) 326 IAC 4-2-2 (Incinerators)
Pursuant to 326 IAC 6-3-1(a), affected facilities include incinerators which emit regulated pollutants located anywhere in the state. The four (4) boilers, identified as emission units B-1-1, B-1-2, B-2-1, and B-3-1, are each not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 do not apply to boilers B-1-1, B-1-2, B-2-1, and B-3-1, and the requirements are not included in this exemption.
- (p) 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
This source is subject to 326 IAC 6-2-4 because the boilers, identified as emission units B-1-1, B-1-2, B-2-1, and B-3-1, located in Marion County, were constructed after September 21, 1983.

Particulate emissions from existing indirect heating facilities located in the specified counties shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

However, for Q less than ten (10) MMBtu/hr, Pt shall not exceed six tenths (0.6) pounds per MMBtu (lb/MMBtu) heat input.

$$Q \text{ for the boilers is } (2.5 + 2.8 + 2.1 + 2.2) = 9.6 \text{ MMBtu/hr.}$$

Therefore, particulate emissions from the boilers, identified as emission units B-1-1, B-1-2, B-2-1, and B-3-1, shall each not exceed six tenths (0.6) pounds per MMBtu.

- (q) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), activities that do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), are exempted from 326 IAC 6-3. The four (4) boilers, identified as emission units B-1-1, B-1-2, B-2-1, and B-3-1, each, do not meet the definition of a "manufacturing process", and are therefore exempt from the requirements of 326 IAC 6-3. Consequently, the requirements are not included in this exemption.
- (r) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

Pursuant to 326 IAC 7-1.1, this rule applies to all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. The potential emissions from each of the four (4) boilers, identified as emission units B-1-1, B-1-2, B-2-1, and B-3-1, combined, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326 IAC 7-1.1-2 does not apply to the four (4) boilers, and the requirements are not included in this exemption.

Bld 2 Emergency Electric Generator

(s) 326 IAC 4-2-2 (Incinerators)

Pursuant to 326 IAC 6-3-1(a), affected facilities include incinerators which emit regulated pollutants located anywhere in the state. The Bld 2 Emergency Electric Generator is not an incinerator, as defined by 326 IAC 1-2-34, since it does not burn waste substances. Therefore, 326 IAC 4-2-2 does not apply to the emergency generator, and the requirements are not included in this exemption.

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

The Bld 2 Emergency Electric Generator does not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, 326 IAC 6-2 does not apply to the emergency generator, and the requirements are not included in this exemption.

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

Pursuant to 326 IAC 6-3-1(a), activities that do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), are exempted from 326 IAC 6-3. The Bld 2 Emergency Electric Generator does not meet the definition of a "manufacturing process", and is therefore exempt from the requirements of 326 IAC 6-3. Consequently, the requirements are not included in this exemption.

(v) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

Pursuant to 326 IAC 7-1.1, this rule applies to all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. The potential emissions from the Bld 2 Emergency Electric Generator are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326 IAC 7-1.1-2 does not apply to the emergency generator, and the requirements are not included in this exemption.

Conclusion and Recommendation

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 July 3, 2007.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 097-24999-00114. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

Appendix A: Emissions Calculations Emission Summary

Company Name: Colorcon, Inc.
Address City IN Zip: 3702 East 21st Street,
 Indianapolis, IN 46218
Permit Number: 097-24999-00114
Reviewer: Hannah L. Desrosiers
Date Received: July 3, 2007

Uncontrolled Potential Emissions (tons/year)						
Category	Emissions Generating Activity					
	Pollutant	Starch Lines (three lines)	Coating Line	Boilers (mult)	Bld 2 Emergency Electric Generator	TOTAL
Criteria Pollutants	PM	0.66	0.03	0.08	0.002	0.77
	PM10	0.66	0.02	0.32	0.007	1.00
	PM2.5	0.66	0.02	0.24	0.005	0.92
	SO2	0	0	0.03	0.001	0.03
	NOx	0	0	4.20	0.090	4.29
	VOC	0	0	0.23	0.005	0.24
	CO	0	0	3.53	0.075	3.61
Hazardous Air Pollutants	Benzene	0	0	8.83E-05	1.88E-06	9.02E-05
	Dichlorobenzene	0	0	5.05E-05	1.08E-06	5.15E-05
	Formaldehyde	0	0	3.15E-03	6.73E-05	3.22E-03
	Hexane	0	0	0.076	0.002	0.077
	Toluene	0	0	1.43E-04	3.05E-06	1.46E-04
	Cadmium	0	0	4.63E-05	9.86E-07	4.72E-05
	Chromium	0	0	5.89E-05	1.26E-06	6.01E-05
	Lead	0	0	2.10E-05	4.48E-07	2.15E-05
	Manganese	0	0	1.60E-05	3.41E-07	1.63E-05
	Nickel	0	0	8.83E-05	1.88E-06	9.02E-05
	Totals	0	0	0.079	0.002	0.081
					0.077	

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

Appendix A: Emissions Calculations
Starch Line Emissions

Company Name: Colorcon, Inc.
Address City IN Zip: 3702 East 21st Street,
Indianapolis, IN 46218
Permit Number: 097-24999-00114
Reviewer: Hannah L. Desrosiers
Date Received: July 3, 2007

Process Rate *	kg/hr	750					
	lb/hr	1,654					
Operating Hours	hr/yr	8,760					
Process	Emission Factor (lb/1,000 lb)	Emission Rate (lb/hr)	Emission Rate (ton/yr)	Number of Sources	Total Particulate Emissions (ton/yr)	Emission Factor Reference AP-42, Chapter 11.26, Talc Processing	
Silo	0.0036	0.00595	0.026	3	0.078	Crushed Talc Storage Bin Loading, with fabric filter	
Feed Hopper	0.0036	0.00595	0.026	3	0.078	Crushed Talc Storage Bin Loading, with fabric filter	
Pellet Tank	0.0036	0.00595	0.026	2	0.052	Crushed Talc Storage Bin Loading, with fabric filter	
Blender/Screening	0.00077	0.00127	0.006	3	0.017	Classifying, with fabric filter	
Final Hopper Transfer	0.0036	0.00595	0.026	2	0.052	Crushed Talc Storage Bin Loading, with fabric filter	
Final Hopper Transfer	0.0018	0.00298	0.013	2	0.026	Pneumatic conveyer venting, with fabric filter	
Final Blender	0.0018	0.00298	0.013	2	0.026	Pneumatic conveyer venting, with fabric filter	
Total Emissions					0.330		
Safety Factor					2.000		
Total Adjusted Emissions					0.659	tons/yr	
					0.151	lbs/hr	

Constants	lb/kg	2.205
	lb/ton	2,000

Methodology:	<p>Total emissions based on rated capacity at 8,760 hours/year.</p> <p>Emission factors are derived from AP-42, Table 11.26-1 (Talc Processing)</p> <p>Emission Rate [after control] (lb/hour) = Maximum throughput (tons/year) x controlled emission factor (lbs/ton) x 1 year/8760 hours</p> <p>Emission Rate [after control] (tons/year) = PTE after control (lbs/hour) x 8760 hours x 1 ton/2000 lbs</p> <p>Total Particulate Emissions (ton/yr) = Emission Rate [after control] (tons/year) * Number of Sources</p> <p>Total Adjusted Emissions [after control] (tons/yr) = Total Emissions [after control] (tons/yr) * Safety Factor</p> <p>Total Adjusted Emissions [after control] (lbs/hr) = Total Adjusted Emissions [after control] (tons/yr) * 200lbs/ton * 1yr/8760 hrs</p>
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Notes:	* Process rate per line. There are three (3) similar lines, as accounted for in the "number of sources" column. The final hopper transfer and final blender activities occur per building; therefore, the two (2) lines in Plant #1 share these activities.
	Based on information provided by the source, the three (3) starch lines do not use or produce materials containing VOCs and/or HAPs.
	No specific emission factors available for this industry. Therefore, similar material handling emission factors were used. The consistency of the Starch, and the type of operations are closest to that of Talc and Talc processing.
	The PTE, for the Starch Lines, is calculated after the emission control device because each of the baghouses have been determined to be "integral to process".
	Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

**Appendix A: Emission Calculations
Coating Line**

Company Name: Colorcon, Inc.
Address City IN Zip: 3702 East 21st Street,
 Indianapolis, IN 46218
Permit Number: 097-24999-00114
Reviewer: Hannah L. Desrosiers
Date Received: July 3, 2007

Process	Process Rate (tons/hr)	PM Emission Factor (lb/ton of material)	Uncontrolled PM Emission Rate (lb/hr)	Uncontrolled PM Emission Rate (tons/yr)	PM10 Emission Factor (lb/ton of Material)	Uncontrolled PM10* Emission Rate (lb/hr)	Uncontrolled PM10* Emission Rate (tons/yr)
Mixer Loading	0.013	0.544	0.007	0.03	0.134	0.004	0.019
Material Transfer	0.013	0.0021	2.81E-05	1.23E-04	0.00099	1.22E-07	5.35E-07
Totals:			0.007	0.03		0.004	0.02

0.18	lbs/day
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0.10	lbs/day
------	---------

Methodology

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

No specific emission factors are available for this industry. The consistency of the materials used and the type of operations conducted in the Coatings Line are closest to that of Concrete Batching. Therefore, emission factors from Concrete Batching (AP 42-11.12, Table 11.12-2 June 2006) for mixer loading (SCC 3-05-011-09) and sand transfer (SCC 3-05-011-05, 22, 24) were used.

Uncontrolled Emission Rate (lbs/hr) = Process Rate (tons/hr) * Emission Factor (lb/ton of material processed)

Uncontrolled Emission Rate (tons/yr) = Uncontrolled Emission Rate (lbs/hr) (8760 hr/yr) (ton/2000 lb)

NOTES

*PM10, and PM 2.5 emissions are assumed equal.

Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

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

Company Name: Colorcon, Inc.
Address City IN Zip: 3702 East 21st Street,
 Indianapolis, IN 46218
Permit Number: 097-24999-00114
Reviewer: Hannah L. Desrosiers
Date Received: July 3, 2007

Emission Unit ID	Heat Input Capacity MMBtu/hr
B-1-1	2.5
B-1-2	2.8
B-2-1	2.1
B-3-1	2.2
	9.6

Potential Throughput
MMCF/yr

84.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	5.7	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.32	0.24	0.03	4.20	0.23	3.53

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is condensable PM2.5 only.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	8.830E-05	5.046E-05	3.154E-03	0.076	1.430E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.102E-05	4.625E-05	5.887E-05	1.598E-05	8.830E-05

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

Total HAPs 0.08 tons/yr

Worst Single HA P 0.076 tons/yr Hexane

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

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

Company Name: Colorcon, Inc.
Address City IN Zip: 3702 East 21st Street,
 Indianapolis, IN 46218
Permit Number: 097-24999-00114
Reviewer: Hannah L. Desrosiers
Date Received: July 3, 2007

Output Capacity kilowatt (kW)	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
39.0	0.20	1.79

Criteria Pollutant Emissions

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	5.7	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.002	0.007	0.005	0.001	0.090	0.005	0.075

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable fractions combined. PM2.5 emission factor is condensable fraction only.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutant Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03
Potential Emission in tons/yr	1.88E-06	1.08E-06	6.73E-05	0.0016	3.05E-06

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	4.48E-07	9.86E-07	1.26E-06	3.41E-07	1.88E-06

Methodology

All emission factors are based on normal firing.

1kW = 1000 Watts

1 Watt = 3.412 Btu/hr

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

A 35% operating efficiency is assumed.

Total HAPs =	0.0017	tons/yr
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Worst Single HAP	0.0016	tons/yr	Hexane
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Heat Input Capacity (MMBtu/hr) = ((kiloWatts * 1000 Watts/1kW * 3.412Btu/hr /Watt)/(1000000Btu/MMBtu))/(1-35% efficiency)

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



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Dave Powers
Colorcon
3702 E 21st Street
Indianapolis, IN 46218

DATE: June 10, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Exemption
097-24999-00114

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Millie Yamada ENSR Corp.
William J. Kesack Jr. IES Engineers
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	LPOGOST 6/10/2009 Colorcon 097-24999-00114 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Dave Powers Colorcon 3702 E 21st Street Indianapolis IN 46218 (Source CAATS) Via confirmed delivery										
2		Marion County Health Department 3838 N. Rural St Indianapolis IN 46205-2930 (Health Department)										
3		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
4		Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party)										
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
7		Ms. Janet McCabe Improving Kids Environment 3951 N Meridian Street Suite 160 Indianapolis IN 46208-4062 (Affected Party)										
8		Millie Yamada ENSR Corp. 1220 Avenid Acaso Camarillo CA 93012 (Consultant)										
9		Mr. William J. Kesack Jr. IES Engineers 1720 Walton Road Blue Bell PA 19422 (Consultant)										
10		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
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