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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

DATE: January 25, 2008
TO: Interested Parties / Applicant
RE: Cryovac Rigid Packaging, Sealed Air Corporation / 097-25330-00093
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch, Office of Air Quality, IDEM

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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

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(800) 451-6027
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January 25, 2008

Brian Hollies
Cryovac Rigid Packaging, Sealed Air Corporation
7950 North Allison Avenue
Indianapolis, IN 46268

Certified Mail 7000 0600 0023 5186 3627

Re: **097-25330-00093**
First Minor Permit Modification
to Part 70 Operating Permit Renewal
No.: **T097-18849-00093**

Dear Mr. Hollies:

Cryovac Rigid Packaging, Sealed Air Corporation was issued Part 70 Operating Permit Renewal No. T097-18849-00093 on October 5, 2005 for a stationary operation of a plastic extrusion and thermoforming facility producing polystyrene foam products. An application to construct new equipment and modify existing extrusion line #251 was received on September 20, 2007. The incorporation of these changes and new emission units qualifies as a minor permit modification pursuant to 326 IAC 2-7-12(b).

Pursuant to 326 IAC 2-7-12(b), changes to the Part 70 Operating Permit Renewal No. T097-18849-00093 were made as shown in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Boris Gorlin, City of Indianapolis, Office of Environmental Services, 2700 South Belmont, Indianapolis, Indiana 46221, or call (317) 327-2280.

Sincerely,

Original signed by:
Matthew Stuckey, Deputy Branch Chief
Permits Branch, Office of Air Quality

Attachments: Revised Part 70 Operating Permit
Technical Support Document

BG

cc: Files
Marion County Health Department
Matt Mosier – OES Air Compliance Section
Mindy Hahn – IDEM, OAQ

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

PART 70 OPERATING PERMIT RENEWAL

Cryovac Rigid Packaging, Sealed Air Corp.
7950 N. Allison Avenue
Indianapolis, Indiana 46268

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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

Operation Permit No.: T097-18849-00093	
Original signed by: Paul Dubenetzky, Branch Chief, Permits Branch, OAQ Felicia A. Robinson, Manager of Environmental Services Indianapolis Office of Environmental Services	Issuance Date: October 5, 2005 Expiration Date: October 5, 2010

First Minor Permit Modification No.: T097-25330-00093	
Issued by: *Original signed by:* Matthew Stuckey, Deputy Branch Chief Permits Branch, Office of Air Quality	Issuance Date: January 25, 2008 Expiration Date: October 5, 2010

TABLE OF CONTENTS

A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS 7
B.1 Definitions [326 IAC 2-7-1]
B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-7-7]
B.5 Severability [326 IAC 2-7-5(5)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3]
B.11 Emergency Provisions [326 IAC 2-7-16]
B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
B.17 Permit Renewal [326 IAC 2-7-4]
B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]
B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
B.21 Source Modification Requirement [326 IAC 2-7-10.5]
B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

C SOURCE OPERATION CONDITIONS 18

Emission Limitations and Standards [326 IAC 2-7-5(1)]
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]
C.2 Opacity [326 IAC 5-1]
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.5 Fugitive Dust Emissions [326 IAC 6-4]
C.6 Operation of Equipment [326 IAC 2-7-6(6)]
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-7-6(1)]
C.8 Performance Testing [326 IAC 3-6]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]
C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]
C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

Stratospheric Ozone Protection
C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS 27
Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-2-3]
D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3]
D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
Compliance Determination Requirements
D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]
D.1.5 Volatile Organic Compounds (VOC)
D.1.6 Particulate Matter (PM)
D.1.7 Parametric Monitoring of the Incinerator

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.1.8 Visible Emissions Notations
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.9 Record Keeping Requirements
D.1.10 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Degreasing 31
Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Organic Solvent Degreasing Operations [326 IAC 8-3-5] [326 IAC 8-3-2]

Certification 33
Emergency Occurrence Report 34
Quarterly Report 36
Quarterly Deviation and Compliance Monitoring Report 37
Attachment A 39

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis Office of Environmental Services (OES). 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary plastic extrusion and thermoforming facility producing polystyrene extruded foam products.

Source Address:	7950 N. Allison Avenue, Indianapolis, Indiana 46268
Mailing Address:	7950 N. Allison Avenue, Indianapolis, Indiana 46268
General Source Phone Number:	(317) 846-4112
SIC Code:	3086
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5; Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Minor Source, under Nonattainment New Source Review 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 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

(a) Two (2) pentane storage tanks with vapor recovery systems, identified as emission unit #1, installed in 1996, each with a maximum capacity of 16, 400 gallons, and exhausting to stack #1.

(b) Four (4) polystyrene extruding lines, each consisting of one (1) extruder (#210 and #220, installed in 1979; #230, installed in 1983; #240, installed in 1985), and two (2) winders, with a total maximum throughput of 4,700 pounds per hour, identified as emission unit #2, and exhausting to stacks # 2a, 2b, 2c, and 2d.

(c) One (1) roll lot, identified as emission unit #3, with a maximum usage of 10, 000 pounds per hour of polystyrene foam sheets, constructed in 1979, and exhausting to stack #3.

(d) Four (4) grinders for extrusion scrap foam and spoilage foam, with cyclones and a vacuum conveying system for transporting scrap foam to storage silo, with a combined maximum usage of 4,500 pounds per hour of polystyrene foam sheet, and exhausting to stack #4. Three grinders, identified as emission unit #4, were installed in 1979. One grinder, identified as emission unit #5, was installed in 1984.

(e) Ten (10) thermoformers, identified as emission unit #6, installed in 1979 through 1999, with a combined maximum capacity of 15,400 pounds per hour,and exhausting to stack #6.

(f) One (1) warehouse for final product storage and handling, identified as emission unit #8, constructed in 1979, with a maximum capacity of 17,500 pounds per hour, and exhausting to stack #8.

(g) Ten (10) underpress and ten (10) beside-the-press grinders and a conveying system for trim and startup scrap, with the cyclones between the grinders and fluff silos, with a maximum usage 9,000 pounds per hour, installed in 1979 through 1999, collectively identified as emission unit #9, and exhausting to stack #9.

(h) Fluff conveying system, identified as emission unit #10, for conveying fluff from fluff silos to reclaim extruders, using two (2) cyclones as particulate control, installed in 1979, with a maximum capacity of 9,000 pounds per hour, and exhausting to stack #10.

(i) Two (2) Reclaim Extruders #510 and #520, identified as emission unit #11, installed in 1980, with a maximum capacity of 2,500 pounds per hour, and exhausting to Stack #11, “Reclaim Flash” incinerator.

(j) One (1) Extruding Line #251, identified as emission units #12, installed in 1999, with a maximum capacity of 1,500 pounds per hour, and exhausting to stacks # 2e, 2f, and 2g, approved for modification in 2007 for Polylactic Acid (PLA) foam production.

(k) Five (5) thermoformers #11 through #15, identified as emission unit #14, installed in 1999 and 2000, with a maximum capacity of 10,950 pounds per hour, and exhausting to stack #6.

(l) One (1) reclaim extruder #530, identified as emission unit #15, installed in 1999 and 2000, with a maximum capacity of 2,000 pounds per hour, and exhausting to stack #11, “Reclaim Flash” incinerator.

(m) Two (2) grinders, identified as emission unit #16, for extrusion scrap and spoilage foam with cyclones and vacuum conveying system for transportation to storage silo, installed in 1999 and 2000, with a maximum capacity of 5,000 pounds per hour, and exhausting to stack #4.

(n) Five (5) underpress grinders and conveying system, identified as emission unit #17, for trim scrap with cyclones between grinders and fluff silos, installed 1999 and 2000, with a maximum capacity of 14,000 pounds per hour, and exhausting to stack #9.

(o) Fluff conveying system, identified as emissions unit #18, for conveying fluff from fluff silos to new reclaim extruder with a cyclone, with a maximum capacity of 4,500 pounds per hour, and exhausting to stack #10.

(p) One (1) Agglomerator for recycling Polylactic Acid (PLA) foam scrap, identified as Emission Unit #19, approved for construction in 2007, with a maximum capacity of 300 pounds per hour, using a baghouse identified as “Dust Collector” for control and exhausting to stack #19.

(q) One (1) PLA foam fluff conveying system for conveying fluff from a thermoformer to a fluff silo, identified as emission unit #20, approved for construction in 2007, with a maximum capacity of 2,000 pounds per hour, using a cyclone for control and exhausting to stack #9.

(r) One (1) PLA foam fluff conveying system for conveying fluff from a fluff silo to the Agglomerator, identified as emission unit #21, approved for construction in 2007, with a maximum capacity of 1,000 pounds per hour and exhausting to stack #20.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Parts cleaner and degreaser, 33 gal capacity, using Naphtha, 150^0F flash point, refilled 3 times per year.

(b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]

(c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3]

(d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)] [326 IAC 2-1.1-9.5]

(a) This permit, T097-18849-00093, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(b) If IDEM, OAQ, and OES, 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, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7]

(a) 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, OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Appendix A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through May 10, 2003 and published in the Indiana Register on June 1, 2003, unless otherwise indicated in the adoption by reference or in Appendix A. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.5 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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 the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES 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 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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 in letter form no later than April 15 of each year to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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, and OES 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 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(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) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES 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 PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) 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.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES 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 IDEM, OAQ, Compliance Section), or:
Telephone Number: 317-233-0178 (ask for IDEM, OAQ, Compliance Section)
Facsimile Number: 317-233-6865;

and

Telephone Number: 317-327-2234 (ask for OES, Air Compliance)
Facsimile Number: 317-327-2274.

(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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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 2-7-5(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 the “responsible official” as defined by 326 IAC 2-7-1(34).

(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) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, and OES 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 2-7 and any other applicable rules.

(g) 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.

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

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, and OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of previous permits issued prior to T097-18849-00093 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

by this permit.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or OES 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 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, or OES 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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

(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, and OES 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 2-7 until IDEM, OAQ, and OES,

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, and OES, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under 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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

(a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and/or 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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, OES, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Permits

2700 South Belmont Avenue
Indianapolis, IN 46221

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, and OES 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, or OES, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), 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, Licencing, and Training Section), and 317-327-2234 (ask for OES, Air Compliance) to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(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 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 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.

C.3 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.4 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.5 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). 326 IAC 6-4-2(4) is not federally enfouceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.

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
MC 61-52 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES if the Permittee submits to IDEM, OAQ, and OES 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification 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 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ, and OES to approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 1, 1989.

(b) Upon direct notification by IDEM, OAQ, and OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [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.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ, and OES of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

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

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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, and OES 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, and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.

(c) IDEM, OAQ, and OES reserve 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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, and OES on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

(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 or the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES Administrator 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) If there is a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emission unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
  - (i) Baseline actual emissions;
  - (ii) Projected actual emissions;
  - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and
  - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

(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 the “responsible official” as defined by 326 IAC 2-7-1(34).

(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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

(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, and OES 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and OES:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and OES. The general public may request this information from the IDEM, OAQ and OES under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 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 FACILITY OPERATION CONDITIONS

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

(a) Two (2) pentane storage tanks with vapor recovery systems, identified as emission unit #1, installed in 1996, and exhausting to stack #1.

(b) Four (4) polystyrene extruding lines, each consisting of one (1) extruder (#210 and #220, installed in 1979; #230, installed in 1983; #240, installed in 1985), and two (2) winders, identified as emission unit #2, and exhausting to stacks # 2a, 2b, 2c, and 2d.

(c) One (1) roll lot, identified as emission unit #3, constructed in 1979, and exhausting to stack #3.

(d) Four (4) grinders for extrusion scrap foam and spoilage foam, three (3) installed in 1979 (three grinders), identified as emission unit #4, and one in 1984 (one grinder), identified as emission unit #5, with cyclones and a vacuum conveying system for transporting scrap foam to storage silo, and exhausting to stack #4.

(e) Ten (10) thermoformers, identified as emission unit #6, installed in 1979 through 1999, and exhausting to stack #6.

(f) One (1) warehouse for final product storage and handling, identified as emission unit #8, constructed in 1979, and exhausting to stack #8.

(g) Ten (10) underpress and ten (10) beside-the-press grinders and a conveying system for trim and startup scrap, with the cyclones between the grinders and fluff silos, with a maximum usage 9,000 pounds per hour, installed in 1979 through 1999, collectively identified as emission unit #9, and exhausting to stack #9.

(h) Fluff conveying system, identified as emission unit #10, for conveying fluff from fluff silos to reclaim extruders, using two (2) cyclones as particulate control, installed in 1979, and exhausting to stack #10.

(i) Two (2) Reclaim Extruders #510 and #520, identified as emission unit #11, installed in 1980, and exhausting to Stack #11, “Reclaim Flash” incinerator.

(j) One (1) Extruding Line #251, identified as emission units #12, installed in 1999, with a maximum capacity of 1,500 pounds per hour, and exhausting to stacks # 2e, 2f, and 2g, approved for modification in 2007 for Polylactic Acid (PLA) foam production**.**

(k) Five (5) thermoformers #11 through #15, identified as emission unit #14, installed in 1999 and 2000, with a maximum capacity of 10,950 pounds per hour, and exhausting to stack #6.

(l) One (1) reclaim extruder #530, identified as emission unit #15, installed in 1999 and 2000, and exhausting to stack #11, “Reclaim Flash” incinerator.

(m) Two (2) grinders, identified as emission unit #16, for extrusion scrap and spoilage foam with cyclones and vacuum conveying system for transportation to storage silo, installed in 1999 and 2000, and exhausting to stack #4.

(n) Five (5) underpress grinders and conveying system, identified as emission unit #17, for trim scrap with cyclones between grinders and fluff silos, installed 1999 and 2000, and exhausting to stack #9.

(o) Fluff conveying system, identified as emissions unit #18, for conveying fluff from fluff silos to new reclaim extruder with a cyclone, and exhausting to stack #10.

(p) One (1) Agglomerator for recycling Polylactic Acid (PLA) foam scrap, identified as Emission Unit #19, approved for construction in 2007, with a maximum capacity of 300 pounds per hour, using a baghouse identified as “Dust Collector” for control and exhausting to stack #19.

(q) One (1) PLA foam fluff conveying system for conveying fluff from a thermoformer to a fluff silo, identified as emission unit #20, approved for construction in 2007, with a maximum capacity of 2,000 pounds per hour, using a cyclone for control and exhausting to stack #9.

(r) One (1) PLA foam fluff conveying system for conveying fluff from a fluff silo to the Agglomerator, identified as emission unit #21, approved for construction in 2007, with a maximum capacity of 1,000 pounds per hour and exhausting to stack #20**.**

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

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-2-3]

(a) Pursuant to Construction Permit CP 097-5348-00093, issued on November 4, 1997, this source shall reduce VOC emissions using best available control technology (BACT). Emissions from the reclaim extruders, identified as emissions units #11 and 15, shall be controlled by the "Reclaim Flash" incinerator, which shall be in operation at all times the reclaim extruders are in operation.

(b) When operating the reclaim extruders, the "Reclaim Flash" incinerator shall maintain a minimum operating temperature to maintain at least 90% overall destruction of the VOC captured.

(c) Material usage of resin and pentane as a blowing agent shall be limited to 28, 546 tons of resin and 1,316 tons of pentane as a blowing agent per twelve consecutive month period, rolled on a monthly basis, which results in the VOC emissions from emission units # 2, 3, 6, 8, 10, 11, 12, 13, 14, and 15 of 805.3 tons per twelve consecutive month period after control, with compliance determined at the end of each month.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3-2(c), the particulate matter (PM) from the extrusion foam and trim scrap grinding and conveying process (emission units #4, 9, and 10) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

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

The process weight rate for emission unit #4 is 2.25 tons per hour, and the particulate emission limit is 7.06 pounds per hour (lb/hr). The process weight rates for emission units #9 and 10 are each 4.5 tons per hour, and the particulate emission limit for each is 11.23 pounds per hour (lb/hr).

(b) Pursuant to 326 IAC 6-3-2(e)(2), when the process weight is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour. The brazing equipment, cutting torches, soldering equipment, welding equipment, and trimmers, identified as insignificant activities, have a maximum process weight rate less than 100 pounds per hour. Therefore, the rate of emissions from each of these units shall not exceed 0.551 pounds per hour of particulate matter.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission units # 4, 9, 10, 11, and 15, and their control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

By March 25, 2009, the Permittee shall conduct a performance test to verify VOC control efficiency as per condition D.1.1(b) for the "Reclaim Flash" incinerator utilizing methods as approved by the Commissioner. This test shall determine a minimum operating temperature to achieve 90% VOC control. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with Condition D.1.1 (c) shall be demonstrated at the end of each month based on the total pentane and resin usage for the most recent twelve (12) month period.

D.1.6 Particulate Matter (PM)

In order to comply with D.1.2, the fluff conveying systems cyclones shall be in operation at all times the grinders and conveying systems are in operation.

D.1.7 Parametric Monitoring of the Incinerator

(a) The Permittee shall determine the appropriate operating temperature of the incinerator from the most recent valid stack test that demonstrates compliance with D.1.1, as approved by IDEM, OAQ, and OES.

(b) The Permittee shall utilize a continuous strip chart to record the operating temperature of the "Reclaim Flash" incinerator. At least once per twenty-four hour period when the incinerator is in operation, the Permittee shall observe and record the minimum operating temperature recorded on the strip chart during that 24 hour period. The operating temperature shall be maintained at or above the temperature as established in the most recent compliant stack test.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from emission units #4, 9, 10, 16, and 17 shall be performed once per week during normal daylight operations when exhausting 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation Records and Reports shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 (c), the Permittee shall maintain records of pentane and resin usage. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and resin usage limits and/or the VOC emission limits established in Condition D.1.1(c).

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.1.7, the Permittee shall, once each 24 hour period, maintain records of the minimum operating temperature recorded by the strip chart during each 24 hour period.

(d) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations once per week for stack exhaust from emission units # 4, 9, 10, 16, and 17. 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).

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 (c) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Parts cleaner and degreaser, 33 gal capacity, using Naphtha, 1500F flash point, refilled 3 times per year.

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

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

D.2.1 Organic Solvent Degreasing Operations [326 IAC 8-3-5] [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) and 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control) and 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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2700 South Belmont Avenue
Indianapolis, IN 46221

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Cryovac Rigid Packaging, Sealed Air Corp.
Source Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Mailing Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: 097-18849-0093

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:
Phone:
Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Cryovac Rigid Packaging, Sealed Air Corp.
Source Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Mailing Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: 097-18849-0093

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

X The Permittee must notify the Office of Air Quality (OAQ), and OES within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and

X 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
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
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

Part 70 Quarterly Report

Source Name: Cryovac Rigid Packaging, Sealed Air Corp.
Source Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Mailing Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: 097-18849-0093
Facility: Emission Units #2, #3, #6, #11, #12, #13, #14, and #15
Parameters: Resin and Pentane
Limit: 28,546 tons per twelve consecutive months of resin; 1,316 tons per 12 consecutive months of Pentane as a blowing agent.

YEAR: _____ QUARTER:_____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Pentane	Resin	Pentane	Resin	Pentane	Resin
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
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Cryovac Rigid Packaging, Sealed Air Corp.
Source Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Mailing Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: 097-18849-0093

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

Page 1 of 2

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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:	

Page 2 of 2

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.

Appendix A

The following State Rules have been adopted by reference by the Indianapolis Air Pollution Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

(1) 326 IAC 1;
(2) 326 IAC 2-3-1 through 326 IAC 2-3-5;
(3) 326 IAC 2-4-1 through 326 IAC 2-4-6;
(4) 326 IAC 2-6-1 through 326 IAC 2-6-4;
(5) 326 IAC 2-7-1 through 2-7-18; 2-7-20 through 2-7-25;
(6) 326 IAC 2-8-1 through 2-8-15, 2-8-17;
(7) 326 IAC 2-9-1 through 2-9-14:
(8) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language “state or local” immediately after the word “federal” in 326 IAC 2-10-1);
(9) 326 IAC 2-11-1, 2-11-3 and 2-11- 4 (The IAPCB adoption adds the language “state or local” immediately after the word “federal” in 326 IAC 2-11-1);
(10) 326 IAC 3-1.1-1 through 3-1.1-5;
(11) 326 IAC 3-2.1 through 3-2.1-5;
(12) 326 IAC 3-3-1 through 3-3-5;
(13) 326 IAC 4-2-1 through 4-2-2;
(14) 326 IAC 5-1-1(a), (b) and (c)(5), 5-1-2(1), (2)(A), (2)(c)(4), 5-1-3 through 5-1-5, 5-1-7;
(15) 326 IAC 6;
(16) 326 IAC 7-1.1-1 and 7-1.1-2;
(17) 326 IAC 7-2-1;
(18) 326 IAC 7-3-1 and 7-3-2
(19) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted):
(20) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
(21) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2-5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
(22) 326 IAC 8-3-1 through 8-3-7;
(23) 326 IAC 8-4-1 through 8-4-5, 8-4-6(a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6 c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) KiloPascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
(24) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
(25) 326 IAC 8-6-1 and 8-6-2;
(26) 326 IAC 9-1-1 and 9-1-2;
(27) 326 IAC 10 (adopted January 8, 2004);
(28) 326 IAC 11-1-1 through 11-1-2
(29) 326 IAC 11-2-1 through 11-2-3;
(30) 326 IAC 11-3-1 through 11-3-6;
(31) 326 IAC 14-1-1 through 14-1-4;
(32) 326 IAC 14-2-1 except 40 CFR 61.145;
(33) 326 IAC 14-3-1;
(34) 326 IAC 14-4-1;
(35) 326 IAC 14-5-1;
(36) 326 IAC 14-6-1;
(37) 326 IAC 14-7-1;
(38) 326 IAC 14-8-1 through 14-8-5;
(39) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
(40) 326 IAC 20;
(41) 326 IAC 21;
(42) 326 IAC 21-1-1 (The adoption state that “or the administrator of OES” is added in (b));
(43) 326 IAC 22-1-1 (The adoption state that “or the administrator of OES” is added in (b));

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis Office of Environmental Services

Technical Support Document (TSD) for a Minor Source Modification and Minor Permit Modification to a Part 70 Operating Permit Renewal

Source Description and Location

Source Name:	**Cryovac Rigid Packaging, Sealed Air Corporation**
Source Location:	**7950 North Allison Avenue, Indianapolis, Indiana 46268**
County:	**Marion**
SIC Code:	**3086**
Operation Permit No.:	**T097-18849-00093**
Operation Permit Issuance Date:	**October 5, 2005**
Minor Source Modification No.:	**097-25311-00093**
Minor Permit Modification No.:	**097-25330-00093**
Permit Reviewer:	**Boris Gorlin**

The Office of Air Quality (OAQ) has reviewed a modification application from Cryovac Rigid Packaging, Sealed Air Corporation relating to construction and operation of one (1) Agglomerator and corresponding fluff conveying systems, and modification of existing Extrusion Line 251, in order to produce a new food tray using a renewable resource resin based on Polylactic Acid (PLA), made from a corn base.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T097-18849-00093 on October 5, 2005. No approvals have been issued since the Renewal.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	nonattainment
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

Note: On November 8, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Marion County for the 8-hour ozone standard.

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

On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, VOC emissions and NOx 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.

(b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review).

(c) Marion County has been classified as attainment or unclassifiable for PM10, SO_2, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
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, and there are no applicable New Source Performance Standards in effect as of August 7, 1980. Therefore, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

(e) 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.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	0.406
PM10	0.230
SO_2	0
VOC	805.6
CO	1.7
NO_x	2.4

(a) This existing source is a major stationary source under PSD (326 IAC 2-2) because VOC, an attainment regulated pollutant, is emitted at a rate of 250 tons per year or more.

(b) This existing source is not a major stationary source under Nonattainment New Source Review (326 IAC 2-1.1-5) because PM2.5 emissions are below 100 tons per year. Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review).

(c) These emissions are based upon the calculations generated for the Part 70 Operating Permit Renewal T097-18849-00093.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Individual HAP	1.17
Combination HAPs	1.35

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per

year for a combination of HAPs. Therefore, this source is not a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.127
PM10	0.072
SO_2	0
VOC	359.05
CO	Negligible
NO_x	Negligible
HAP (Styrene)	0.171

Description of Proposed Modification

On September 20, 2007, Cryovac Rigid Packaging, Sealed Air Corporation submitted an application to IDEM, OAQ and OES, requesting modification of the Extruding Line #251, identified as emission unit #12, installed in 1999, with a maximum capacity of 1,500 pounds per hour, including construction and operation of one (1) Agglomerator and two (2) fluff conveying systems. Particulate emissions will be controlled by a cyclone and a baghouse. The purpose of this modification is to allow, along with current production of Polystyrene food trays, production of new, more environmentally friendly food trays made with a renewable resource resin - Polylactic Acid (PLA) which is made from a corn base. The new product production will require the same amounts of blowing agent (pentane) and is expected to retain the same amounts of blowing agent in the finished product as used in the production of the Polystyrene product. Therefore, VOC emissions from the production of the new product will be similar to the production of the current product.

Scrap material from existing Extruding Line #251 Thermoformers which process PLA foam will be pneumatically conveyed to a silo that will be controlled by a small cyclone. Material will then be pneumatically conveyed from the silo to the Agglomerator which uses mechanical pressure to create a denser scrap material. The “densified” material will be conveyed back to the extruder to be reprocessed. The Agglomerator will be controlled by a baghouse. The Agglomerator is necessary to recycle the scrap material from the production of the new PLA product because PLA scrap cannot take heat, and therefore, cannot be processed in the existing Reclaim Extruder.

The modification consists of construction and operation of the following emission units and control devices:

(a) One (1) Agglomerator for recycling Polylactic Acid (PLA) foam scrap, identified as Emission Unit #19, approved for construction in 2007, with a maximum capacity of 300 pounds per hour, using a baghouse identified as “Dust Collector” for control and exhausting to stack #19.

(b) One (1) PLA foam fluff conveying system for conveying fluff from a thermoformer to a fluff silo, identified as emission unit #20, approved for construction in 2007, with a maximum capacity of 2,000 pounds per hour, using a cyclone for control and exhausting to stack #9.

(c) One (1) PLA foam fluff conveying system for conveying fluff from a fluff silo to the Agglomerator, identified as emission unit #21, approved for construction in 2007, with a maximum capacity of 1,000 pounds per hour and exhausting to stack #20.

Enforcement Issues

On September 11, 2007 a Notice of Violation was issued to the Cryovac Rigid Packaging, Sealed Air Corporation, concerning a violation of the Reclaim Flash Incinerator temperature record keeping and recording. This violation is not related to the current modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
#19	Agglomerator Baghouse	TBD	TBD	5,300	Ambient
#20	Fluff Conveying System	TBD	TBD	1,400	Ambient

Emission Calculations

See TSD Appendix A (one page).

Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.776
PM10*	0.439
SO_2	0
VOC	14.22
CO	0
NO_x	0

* In accordance with Nonattainment Major NSR Program, PM10 emissions represent PM2.5 emissions. See Permit Level Determination - PSD or Emission Offset section.

HAPs	Potential To Emit (tons/year)
Individual HAP	0
TOTAL	0

Note: no HAPs will be emitted as a result of this modification

Pursuant to 326 IAC 2-7-10.5(d)(3), this modification requires a minor source modification because the potential to emit of VOC (14.22 tons per year) from the modification is less than twenty five (25) tons per year but greater than 10 tons per year and it does not require the use of air pollution control equipment to comply with applicable provisions of 326 IAC 8.

Incorporation of this minor source modification in the Part 70 Operating Permit Renewal 097-18849-00093 qualifies as a minor permit modification pursuant to 326 IAC 2-7-12(b). These changes qualify as a minor permit modification because they do not qualify as an Administrative

Amendment and they comply with all of the following (as listed in 326 IAC 2-7-12(b)):

(a) Does not violate any applicable requirement;
(b) Does not involve a significant change to existing monitoring, reporting or record keeping requirements in the permit;
(c) Does not require or change a:
  (1) Case-by-case determination of an emission limit or other standard;
  (2) Source specific determination for a temporary sources of ambient impacts; or
  (3) Visibility or incremental analysis.
(d) Does not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which their source would otherwise be subject;
(e) It is not a modification under any provision of Title I of the Clean Air Act, except for those modifications whose only Title I requirement is to be registered under 326 IAC 2-1-2; and
(f) It is not required to be processed as a significant permit modification under 326 IAC 2-7-12(d).

Permit Level Determination – PSD or Nonattaiment New Source Review

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Potential to Emit						
Pollutant	PM	PM10	SO_2	VOC	CO	NOx
Total	0.776	0.439	0	14.22	0	0
PSD and Nonattainment NSR Significant Levels	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels for all attainment criteria pollutants. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Marion County has been designated as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source’s PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A significant emissions increase would be a net emissions increase or the potential of fifteen (15) tons per year or greater of PM10. Total PM10 emissions from this modification are less than fifteen (15) tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 does not apply for PM2.5.

Federal Rule Applicability Determination

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

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

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This modification to an existing source is not considered major under nonattainment NSR because it has the potential to emit less than 15 tons per year of PM10 (as a surrogate for PM2.5). Therefore, the Nonattainment New Source Review requirements are not applicable.

326 IAC 2-2 (PSD)

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels for all attainment criteria pollutants. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-3 (Emission Offset)

This modification to an existing major stationary source is not major because no nonattainment air pollutants will be emitted at or greater than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

326 IAC 2-4.1 (New Source Toxic Control)

This modification will not result in the emission of HAPs; therefore, 326 IAC 2-4.1 is 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 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.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

Uncontrolled total PM potential emissions of this modification (Agglomerator and two (2) fluff conveying systems, emission units #19, 20, and 21 respectively), are 0.493 pound per hour (see Appendix A, page 1 of 1). Pursuant to 326 IAC 6-3-1(b)(14), the Agglomerator and two (2) fluff conveying systems, emission units #19, 20, and 21 respectively, are exempt from requirements of 326 IAC 6-3-2 as manufacturing processes with potential emissions less than five hundred fifty-five thousands (0.551) pound per hour.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This rule does not apply to this source because potential to emit of PM is less than 100 tons per year and actual emissions are less than 10 tons per year.

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

The requirements of 326 IAC 8-1-6 apply to new facilities (as of January 1, 1980) which have potential emissions of 25 tons or more per year of volatile organic compounds (VOC). Potential VOC emissions from this modification are less than twenty five (25) tons per year; therefore, 326 IAC 8-1-6 does not

apply.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 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, and OES in conjunction with the source must develop specific conditions to satisfy 326 IAC 2-7-5. 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.

No Compliance Monitoring requirements are included in this permit for the new Agglomerator and two (2) fluff conveying systems.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 097-7552-00315. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**.

(a) The Part 70 Permit Expiration Date was corrected on the Permit Title Page to correspond with five (5) year term from the date of the Permit issuance:

Issuance Date: October 5, 2005
Expiration Date: October ~~4~~ **5**, 2010

(b) General source information has been updated in Condition A.1. IDEM, OAQ and OES have decided to remove the Responsible Official information in order to minimize unnecessary permit modifications in the future. IDEM, OAQ and OES will continue to gather and retain this information up-to-date in their permit tracking system. Condition A.1 has been updated to reflect that Marion County is now designated as attainment for the 8 hour ozone standard. Condition A.2 was revised to update the description of emission units.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary plastic extrusion and thermoforming facility producing polystyrene extruded foam products.

~~Responsible Official:~~	~~Plant Manager~~
Source Address:	7950 N. Allison Avenue, Indianapolis, Indiana 46268
Mailing Address:	7950 N. Allison Avenue, Indianapolis, Indiana 46268
General Source Phone Number:	(317) 846-4112
SIC Code:	3086
County Location:	Marion
Source Location Status:	Nonattainment ~~for ozone under the 8-hour standard and~~ for PM2.5; Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD ~~and Emission Offset~~ **Minor Source, under Nonattainment New Source Review** **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 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

...

(j) One (1) Extruding Line #251, identified as emission units #12, installed in 1999, with a maximum capacity of 1,500 pounds per hour, and exhausting to stacks ## 2e, 2f, and 2g, **approved for modification in 2007 for Polylactic Acid (PLA) foam production.**

...

(p) One (1) Agglomerator for recycling Polylactic Acid (PLA) foam scrap, identified as Emission Unit #19, approved for construction in 2007, with a maximum capacity of 300 pounds per hour, using a baghouse identified as "Dust Collector" for control and exhausting to stack #19.

(q) One (1) PLA foam fluff conveying system for conveying fluff from a thermoformer to a fluff silo, identified as emission unit #20, approved for construction in 2007, with a maximum capacity of 2,000 pounds per hour, using a cyclone for control and exhausting to stack #9.

(r) One (1) PLA foam fluff conveying system for conveying fluff from a fluff silo to the Agglomerator, identified as emission unit #21, approved for construction in 2007, with a maximum capacity of 1,000 pounds per hour and exhausting to stack #20.

(c) The mailing addresses for IDEM have been updated throughout the permit as follows:

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

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**

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

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
MC 61-52 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204**-2251**

(d) Condition B.11, the Part 70 Operating Permit Renewal Certification Report and Emergency Occurance Report were revised to update IDEM, OAQ Compliance Branch mailing address and Phone and Fax numbers:

B.11 Emergency Provisions [326 IAC 2-7-16]

...

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES 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 IDEM, OAQ, Compliance Section), or:
Telephone Number: 317-233-~~5674~~ **0178** (ask for IDEM, OAQ, Compliance Section)
Facsimile Number: 317-233-~~5967~~ **6865**;

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204**-2251**
Phone: 317-~~233-5674~~ **233-0178**
Fax: 317-~~233-5967~~ **233-6865**

...

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

...

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

X The Permittee must notify the Office of Air Quality (OAQ), and OES within four (4) business hours (1-800-451-6027 or 317-233-~~5674~~ **0178**, ask for Compliance Section); and

X The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-~~5967~~ **6865**), and follow the other requirements of 326 IAC 2-7-16.

...

(e) Condition C.5 was updated to clarify that 326 IAC 6-4-2(4) is not federally enforceable:

C.5 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). **326 IAC 6-4-2(4) is not federally enforceable.**

(f) Condition C.17 was revised according to revision of the 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

~~(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:~~

(a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

...

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
MC 61-50 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204**-2251**

...

(g) Condition C.18(c) has been modified. The clean unit and pollution control project provisions of the U.S. EPA's New Source Review Reform Rules were vacated on June 24, 2005 by a United States Court of Appeals for the District of Columbia Circuit decision. This decision also remanded the "reasonable possibility" standard back to U.S. EPA. The OAQ plans to remove the vacated provisions from 326 IAC 2 at the next state rulemaking opportunity. Paragraph (c) of Condition C.18 General Recordkeeping Requirements has been revised to reflect the court decision.:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

...

(c) If there is ~~a reasonable possibility that~~ a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emission unit, other than projects at a ~~Clean Unit~~ **source with a Plantwide Applicability Limitation (PAL)**, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) ~~may result in significant emissions increase~~ and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

...

(h) Section D.1 Facility Description was revised to reflect addition of new equipment:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

(j) One (1) Extruding Line #251, identified as emission units #12, installed in 1999, with a maximum capacity of 1,500 pounds per hour, and exhausting to stacks ## 2e, 2f, and 2g**, approved for modification in 2007 for Polylactic Acid (PLA) foam production**.

...

(p) One (1) Agglomerator for recycling Polylactic Acid (PLA) foam scrap, identified as Emission Unit #19, approved for construction in 2007, with a maximum capacity of 300 pounds per hour, using a baghouse identified as “Dust Collector” for control and exhausting to stack #19.

(q) One (1) PLA foam fluff conveying system for conveying fluff from a thermoformer to a fluff silo, identified as emission unit #20, approved for construction in 2007, with a maximum capacity of 2,000 pounds per hour, using a cyclone for control and exhausting to stack #9.

(r) One (1) PLA foam fluff conveying system for conveying fluff from a fluff silo to the Agglomerator, identified as emission unit #21, approved for construction in 2007, with a maximum capacity of 1,000 pounds per hour and exhausting to stack #20.

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

...

(i) Condition D.1.9(d) was updated to clarify visible emissions notations recordkeeping requirements:

D.1.9 Record Keeping Requirements

...

(d) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations once per week for stack exhaust from emission units # 4, 9, 10, 16, and 17. **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).**

...

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 097-25311-00093 and Minor Permit Modification No. 097-25330-00093. The staff recommends to the Administrator that this Part 70 Minor Source Modification and Minor Permit Modification be approved.

Company Name: Cryovac Rigid Packaging, Sealed Air Corp.
Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Minor Source Modification No.: 097-25311-00093
Minor Permit Modification No.: 097-25330-00093
Part 70 Operating Permit Renewal No.: 097-18849-00093
Permit Reviewer: Boris Gorlin
Date: November 16, 2007

Agglomerator and fluff conveying systems (EU ID#: 19, 20)

Fluff Conveying Systems Capacity, (lb/hr)	Emission Factor (lb PM/lb extruded)	Percent of PM that is PM10	Baghouse/ Cyclone Control Efficiency
2000	8.86E-05	56.60%	95%

PM Calculations

Uncontrolled Emissions				Controlled Emissions			
Silo		Agglomerator		Silo		Agglomerator	
(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
8.86E-02	3.88E-01	8.86E-02	3.88E-01	4.43E-03	1.94E-02	4.43E-03	1.94E-02
		Total:	**0.7761**			**Total:**	**0.0388**

PM10 Calculations

Uncontrolled Emissions				Controlled Emissions			
Silo		Agglomerator		Silo		Agglomerator	
(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
5.01E-02	2.20E-01	5.01E-02	2.20E-01	2.51E-03	1.10E-02	2.51E-03	1.10E-02
		Total:	**0.4393**			**Total:**	**0.0220**

Note: Emission factor is based on emission rate confirmed by a most recent Stack Test (performed on March 25, 2004).
Assume that 50% of emissions are emitted entering the Silo (Stacks 9 and 20).
Assume that 50% of emissions are emitted entering the Agglomerator (Stack 19).

PM Emissions (lb/hr) = Emission Factor (lb/lb) x Throughput (lb/hr) x 50%
PM Emissions (tons/yr) = PM Emissions (lb/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs
Controlled Emissions = Uncontrolled Emissions x (1 - Control Efficiency)
PM10 Emissions = PM Emissions x Percent of PM that is PM10 (%)

Emission Unit	Throughput to Silo (lb/hr)	lb Pentane / ton material	% Pentane Flashed	VOC Emissions	
				(lb/hr)	(tons/yr)
Silo	2000	4.594	0.34%	0.016	0.068
Agglomerator	300	21.644	100%	3.247	14.220

The Silo % Pentane Flashed rate is based on fluff conveying system material balance and fluff chemical analysis conducted by the source and approved by OES and IDEM, OAQ in the initial Part 70 Operating Permit and Renewal emission calculations.

The Agglomerator % Pentane Flashed rate is conservatively assumed to be 100%.
VOC Emissions (lb/hr) = Throughput (lb/hr) x lb Pentane/ton material x % Pentane Flashed
VOC Emissions (tons/yr) = VOC Emissions (lb/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

326 IAC 6-3-2 (Particulate Emission Limitation)

Process Weight:	2,000 lb/hr,	or:	1.000 ton/hr
$E = 4.10\ P^{0.67}$	**PM Limit:**	**4.1 lb/hr**	