INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 11, 2008

RE: Westech Building Products, Inc. / 129-26447-00029

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

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

REGISTRATION
OFFICE OF AIR QUALITY

Westech Building Products, Inc.
7451 Highway 62 East
Mount Vernon, Indiana 47620

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 129-26447-00029	
Issued by: *Original document* *signed by* Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 11, 2008

SECTION A SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary PVC resin mixing and extruding source.

Source Address:	7451 Highway 62 East, Mount Vernon, Indiana 47620
Mailing Address:	P.O. Box 576, Mount Vernon, Indiana 47620
General Source Phone Number:	(812) 985-3628
SIC Code:	3089
County Location:	Posey County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) extruder process, consisting of sixteen (16) extruder lines identified as EU-01A through EU-16B, constructed in the years 1996, 1998, 2000, 2002, 2003, 2006, 2007, and 2008; with a combined throughput bottlenecked by the dies process to a maximum of 56,283 tons of PVC per year; the extruder lines have no add on control devices and exhaust within the building.

Emission Unit ID	Extruder Model No.	Maximum Capacity	
		lbs/hr	tons/year
EU-01A	TS100	1,000	4,380
EU-01B	DSK62	600	2,628
EU-02A	TS88	900	3,942
EU-02B	CM55	400	1,752
EU-03A	CM80	1,300	5,694
EU-03B	CM55	400	1,752
EU-04A	TP93	1,000	4,380
EU-04B	CM55	400	1,752
EU-05	TP93-26	990	4,336
EU-06	DSK62	600	2,628
EU-07	PR605-72R	675	2,957
EU-08	DSK62	600	2,628
EU-09	TTM98	1,560	6,833
EU-10A	TS88	900	3,942
EU-10B	DSK62	600	2,628
EU-11A	TS88	900	3,942
EU-11B	DSK62	600	2,628
EU-12A	TS100	1,000	4,380
EU-12B	DSK62	600	2,628
EU-13A	TS100	1,000	4,380

Emission Unit ID	Extruder Model No.	Maximum Capacity	
		lbs/hr	tons/year
EU-13B	DSK62	600	2,628
EU-14A	TTM98	1,560	6,833
EU-14B	CON63	400	1,752
EU-15	KMD 90-26	1,500	6,570
EU-16A	KMD 90-26	1,500	6,570
EU-16B	KDM 2-60	660	2,891

(b) One (1) old blend room constructed in 1972, consisting of two (2) mixers identified as EU-M1 and EU-M2 and two (2) coolers identified as EU-C1 and EU-C2. EU-M1 and EU-C1 each have maximum capacities of 7200 pounds per hour. EU-M2 and EU-C2 each have maximum capacities of 4800 pounds per hour. Particulate emissions are controlled by fabric filters which are considered integral to the process and exhaust within the building.

(c) One (1) new blend room, constructed in 2000, consisting of one (1) mixer identified as EU-M3 and one (1) cooler identified as EU-C3. EU-M3 and EU-C3 each have maximum capacities of 7200 pounds per hour. Particulate emissions are controlled by a vacuum receiver which is considered integral to the process and exhaust within the building.

(d) One (1) scrap grinder, constructed in 1972, identified as SG, with a maximum capacity of 1,200 pounds of scrap plastic ground per hour. There is no add on control device for particulate emissions; emissions exhaust within the building.

(e) Sixteen (16) propane -fired heat guns, constructed in 1998, 2000, 2002, 2003, 2006, and 2007, identified as HG-01 through HG-16, each with a maximum capacity of 0.125 MMBtu per hour.

(f) Sixteen (16) cut off saws, constructed in 1986, 1989, 1990, 1998, 200, 2002, 2003, 2006, and 2007, identified as CO-01 through CO-16, with a combined maximum throughput of 56,283 tons of PVC per year. There are no add on control devices for particulate emissions; emissions exhaust within the building.

(g) Twelve (12) compound storage silos, identified as CS-01 through CS-12, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a combination of fabric filters, bin vents, and a cartridge filter and exhaust within the building.

(h) Three (3) resin storage silos, identified as RS-01 through RS-03, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a combination of fabric filters and a bin vent and exhaust within the building.

(i) Five (5) regrind storage silos, identified as RG-01 through RG-05, with a combined throughput of 5,256 tons of PVC per year; exhaust emissions are controlled by a combination of cyclone separators and a dust collector and exhaust within the building.

(j) Thirteen (13) microhoppers, identified as MH-01 through MH-13, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a dust collector which is considered integral to the process; emissions exhaust within the building.

(k) Degreasing operations that do not exceed 145 gallons per 12 months consisting of the following:

(1) One (1) cold cleaning degreasing operations.

SECTION B GENERAL CONDITIONS

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

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

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this registration.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.

(d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to Registration No. 129-26447-00029 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

Indianapolis, IN 46204-2251

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

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

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

C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

SECTION D.1 OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

(a) One (1) extruder process, consisting of sixteen (16) extruder lines identified as EU-01A through EU-16B, constructed in the years 1996, 1998, 2000, 2002, 2003, 2006, 2007, and 2008, with a combined throughput bottlenecked by the dies process to a maximum of 56,283 tons of PVC per year; the extruder lines have no add on control devices and exhaust within the building.

Emission Unit ID	Extruder Model No.	Maximum Capacity	
		lbs/hr	tons/year
EU-01A	TS100	1,000	4,380
EU-01B	DSK62	600	2,628
EU-02A	TS88	900	3,942
EU-02B	CM55	400	1,752
EU-03A	CM80	1,300	5,694
EU-03B	CM55	400	1,752
EU-04A	TP93	1,000	4,380
EU-04B	CM55	400	1,752
EU-05	TP93-26	990	4,336
EU-06	DSK62	600	2,628
EU-07	PR605-72R	675	2,957
EU-08	DSK62	600	2,628
EU-09	TTM98	1,560	6,833
EU-10A	TS88	900	3,942
EU-10B	DSK62	600	2,628
EU-11A	TS88	900	3,942
EU-11B	DSK62	600	2,628
EU-12A	TS100	1,000	4,380
EU-12B	DSK62	600	2,628
EU-13A	TS100	1,000	4,380
EU-13B	DSK62	600	2,628
EU-14A	TTM98	1,560	6,833
EU-14B	CON63	400	1,752
EU-15	KMD 90-26	1,500	6,570
EU-16A	KMD 90-26	1,500	6,570
EU-16B	KDM 2-60	660	2,891

(b) One (1) old blend room constructed in 1972, consisting of two (2) mixers identified as EU-M1 and EU-M2 and two (2) coolers identified as EU-C1 and EU-C2. EU-M1 and EU-C1 each have maximum capacities of 7200 pounds per hour. EU-M2 and EU-C2 each have maximum capacities of 4800 pounds per hour. Particulate emissions are controlled by fabric filters which are considered integral to the process and exhaust within the building.

(c) One (1) new blend room, constructed in 2000, consisting of one (1) mixer identified as EU-M3 and one (1) cooler identified as EU-C3. EU-M3 and EU-C3 each have maximum capacities of 7200 pounds per hour. Particulate emissions are controlled by a vacuum receiver which is considered integral to the process and exhaust within the building.

(d) One (1) scrap grinder, constructed in 1986, identified as SG, with a maximum capacity of 1,200 pounds of scrap plastic ground per hour. There is no add on control device for particulate emissions; emissions exhaust within the building.

(e) Sixteen (16) propane -fired heat guns, constructed in 1998, 2000, 2002, 2003, 2006, and 2007, identified as HG-01 through HG-16, each with a maximum capacity of 0.125 MMBtu per hour.

(f) Sixteen (16) cut off saws, constructed in 1986, 1989, 1990, 1998, 2000, 2002, 2003, 2006, and 2007, identified as CO-01 through CO-16, with a combined maximum throughput of 56,283 tons of PVC per year. There are no add on control devices for particulate emissions; emissions exhaust within the building.

(g) Eleven (11) compound storage silos, identified as CS-01 through CS-12, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a combination of fabric filters, bin vents, and a cartridge filter and exhaust within the building.

(h) Three (3) resin storage silos, identified as RS-01 through RS-03, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a combination of fabric filters and a bin vent and exhaust within the building.

(i) Five (5) regrind storage silos, identified as RG-01 through RG-05, with a combined throughput of 5,256 tons of PVC per year; exhaust emissions are controlled by a combination of cyclone separators and a dust collector and exhaust within the building.

(j) Thirteen (13) microhoppers identified as MH-01 through MH-13, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a dust collector which is considered integral to the process; emissions exhaust within the building.

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The particulate matter (PM) emissions from the following processes shall be limited by the following equation:

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

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

Emission Unit/Process	Process Weight Rate (lb/hr)	Allowable PM Emission Rate (326 IAC 6-3-2) (lb/hr)
(2) Mixers/Grinders in Old Blend Rm. (1) Mixer/Grinder in New Blend Rm.	12850	14.26
(16) Cut Off Saws	129	0.65
(12) Compound Storage Silos	12850	14.26
(3) Resin Storage Silos	12850	14.26

(5) Regrind Storage Silos	1200	2.91
(13) Microhoppers	12850	14.26

Allowable PM emission rate was calculated using the total throughput for all emission units per process.

D.1.2 Particulate Control

Except as otherwise provided by statute, rule, or this permit, the fabric filters, vacuum receivers, and dust collector for PM control shall be in operation and control emissions at all times EU-M1 through EU-M3, EU-C1 through EU-C3, and MH-01 through MH-16 are in operation.

SECTION D.2 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

(a) Degreasing operations that do not exceed 145 gallons per 12 months consisting of the following:

(1) One (1) cold cleaning degreasing operations.

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

Emission Limitations and Standards

D.2.1 326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, the owner or operator of the cold cleaning facility shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 326 IAC 8-3-5 (Cold Cleaner Operation and Control)

Pursuant to 326 IAC 8-3-5(a), 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 (38ºC) (one hundred degrees Fahrenheit (100ºF));
(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 (38ºC) (one hundred degrees Fahrenheit (100ºF)), 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 (38ºC) (one hundred degrees Fahrenheit (100ºF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9ºC) (one hundred twenty degrees Fahrenheit (120ºF)):

(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.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), 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
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

REGISTRATION
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Westech Building Products, Inc.
Address:	7451 Highway 62 East
City:	Mount Vernon, Indiana 47620
Phone Number:	(812) 985-3628
Registration No.:	129-26447-00029

I hereby certify that Westech Building Products, Inc. is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Westech Building Products, Inc. is :
- ☐ in compliance with the requirements of Registration No. 129-26447-00029.
- ☐ not in compliance with the requirements of Registration No. 129-26447-00029.

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

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

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a MSOP transitioning to Registration

Source Description and Location

Source Name:	**Westech Building Products, Inc.**
Source Location:	**7451 Highway 62 East, Mount Vernon, Indiana 47620**
County:	**Posey**
SIC Code:	**3089**
Registration (or Exemption) No.:	**129-26447-00029**
Permit Reviewer:	**Jason R. Krawczyk**

On April 23, 2008, the Office of Air Quality (OAQ) has received an application from Westech Building Products, Inc. related to the construction and operation of new emission units at an existing PVC resin mixing and extruding source and transition from a MSOP to a Registration.

Existing Approvals

The source has been operating under previous approval including, but not limited to, the following:

(a) Minor Source Operating Permit 129-23560-00029 issued on November 9, 2007.

Due to this application, the source is transitioning from a MSOP to a Registration.

County Attainment Status

The source is located in Posey County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for $PM_{2.5}$.

(a) Ozone Standards

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

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary

emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

(4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Posey County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Other Criteria Pollutants
Posey County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.5 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Westech Building Products, Inc. on April 23, 2008, relating to the addition of compound silo Number 12, the replacement of extruder 4a, and the transition of the facility from an MSOP to a Registration based on the determination of integral control arguments for the silo, microhopper, and blend room control devices.

The source consists of the following existing emission unit(s):

(a) One (1) extruder process, consisting of sixteen (16) extruder lines identified as EU-01A through EU-16B, constructed in the years 1996, 1998, 2000, 2002, 2003, 2006, 2007, and 2008; with a combined throughput bottlenecked by the dies process to a maximum of 56,283 tons of PVC per year; the extruder lines have no add on control devices and exhaust within the building.

Emission Unit ID	Extruder Model No.	Maximum Capacity	
		lbs/hr	tons/year
EU-01A	TS100	1,000	4,380
EU-01B	DSK62	600	2,628
EU-02A	TS88	900	3,942
EU-02B	CM55	400	1,752
EU-03A	CM80	1,300	5,694
EU-03B	CM55	400	1,752
EU-04A	CM80	1,300	5,694

Emission Unit ID	Extruder Model No.	Maximum Capacity	
		lbs/hr	tons/year
EU-04B	CM55	400	1,752
EU-05	TP93-26	990	4,336
EU-06	DSK62	600	2,628
EU-07	PR605-72R	675	2,957
EU-08	DSK62	600	2,628
EU-09	TTM98	1,560	6,833
EU-10A	TS88	900	3,942
EU-10B	DSK62	600	2,628
EU-11A	TS88	900	3,942
EU-11B	DSK62	600	2,628
EU-12A	TS100	1,000	4,380
EU-12B	DSK62	600	2,628
EU-13A	TS100	1,000	4,380
EU-13B	DSK62	600	2,628
EU-14A	TTM98	1,560	6,833
EU-14B	CON63	400	1,752
EU-15	KMD 90-26	1,500	6,570
EU-16A	KMD 90-26	1,500	6,570
EU-16B	KDM 2-60	660	2,891

(b) One (1) old blend room constructed in 1972, consisting of two (2) mixers identified as EU-M1 and EU-M2 and two (2) coolers identified as EU-C1 and EU-C2. EU-M1 and EU-C1 each have maximum capacities of 7200 pounds per hour. EU-M2 and EU-C2 each have maximum capacities of 4800 pounds per hour. Particulate emissions are controlled by fabric filters which are considered integral to the process and exhaust within the building.

(c) One (1) new blend room, constructed in 2000, consisting of one (1) mixer identified as EU-M3 and one (1) cooler identified as EU-C3. EU-M3 and EU-C3 each have maximum capacities of 7200 pounds per hour. Particulate emissions are controlled by a vacuum receiver which is considered integral to the process and exhaust within the building.

(d) One (1) scrap grinder, constructed in 1986, identified as SG, with a maximum capacity of 1,200 pounds of scrap plastic ground per hour. There is no add on control device for particulate emissions; emissions exhaust within the building.

(e) Sixteen (16) propane -fired heat guns, constructed in 1998, 2000, 2002, 2003, 2006, and 2007, identified as HG-01 through HG-16, each with a maximum capacity of 0.125 MMBtu per hour.

(f) Sixteen (16) cut off saws, constructed in 1986, 1989, 1990, 1998, 2000, 2002, 2003, 2006, and 2007, identified as CO-01 through CO-16, with a combined maximum throughput of 56,283 tons of PVC per year. There are no add on control devices for particulate emissions; emissions exhaust within the building.

(g) Eleven (11) compound storage silos, identified as CS-01 through CS-11, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a combination of fabric filters, bin vents, and a cartridge filter and exhaust within the building.

(h) Three (3) resin storage silos, identified as RS-01 through RS-03, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a combination of fabric filters and a bin vent and exhaust within the building.

(i) Five (5) regrind storage silos, identified as RG-01 through RG-05, with a combined throughput of 5,256 tons of PVC per year; exhaust emissions are controlled by a combination of cyclone separators and a dust collector and exhaust within the building.

(j) Thirteen (13) microhoppers, identified as MH-01 through MH-13, with a combined throughput of 56,283 tons of PVC per year; exhaust emissions are controlled by a dust collector which is considered integral to the process; emissions exhaust within the building.

(k) Degreasing operations that do not exceed 145 gallons per 12 months consisting of the following:

(1) Two (2) cold cleaning degreasing operations.

The following is a list of the new/modified emission unit(s) and pollution control device(s):

(a) One (1) compound storage silo, identified as CS-12, with a maximum storage capacity of 229,000 lbs, approved for construction in 2008; with particulate emissions controlled by a bin vent and exhausting within the building.

(b) One (1) extruder line, identified as EU-04A, constructed in 1989, approved for modification in 2008, with a maximum capacity of 4,380 tons per year.

The previous extruder line was a model CM80 identified as EU-04A, with a maximum capacity of 1,300 lbs/hr is being replaced with a new line model TP93, with a maximum capacity of 1,000 lbs/hr. The new line will maintain the identification of EU-04A

The following is a list of the emission unit(s) and pollution control devices(s) that have been removed from the site:

(a) One (1) cold cleaning degreasing operation.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of no unpermitted emission units.

"Integral Part of the Process" Determination

(a) The Permittee has submitted the following information to justify why the fabric filters and vacuum receivers should be considered an integral part of the blend rooms' mixing and cooling process:

The operation of the fabric filters and vacuum receivers results in a positive net economic effect because it enables the blend rooms' mixing and cooling process of the PVC resin operations to recycle several tons of fugitive materials that would otherwise cost the company thousands of dollars in lost raw materials.

(b) The Permittee has submitted the following information to justify why the dust collector should be considered an integral part of the microhopper load-in load-out process:

The operation of the dust collector results in a positive net economic effect because it enables the microhopper load-in load-out process of the PVC resin operations to recycle several tons of fugitive materials that would otherwise cost the company thousands of dollars in lost raw

materials.

IDEM, OAQ has evaluated the information submitted and agrees that the fabric filters and vacuum receivers should be considered an integral part of the blend rooms' mixing and cooling process and the dust collector should be considered an integral part of the microhopper load-in process. This determination is based on the fact that annual raw material cost avoidance of the fabric filters and vacuum receivers for the blend rooms' mixing and cooling process and the dust collector for the microhopper load-in process is greater than the initial cost and annual maintenance costs of the control equipment. Therefore, the permitting level will be determined using the potential to emit after the fabric filters and vacuum receivers for the blend rooms' mixing and cooling process and the dust collector for the microhopper load-in process. Operating conditions in the proposed permit will specify that this control equipment shall operate at all times when the blend rooms mixing and cooling process and the microhopper load-in process are in operation.

(c) The Permittee has submitted the following information to justify why the fabric filters, bin vent, cyclones, and dust collector should be considered an integral part of the compound, resin, and regrind storage silos load-in load-out:

The operation of the fabric filters, bin vent, cyclones, and dust collector results in a positive net economic effect because it enables the compound, resin, and regrind storage silos load-in process of the PVC resin operations to recycle several tons of fugitive materials that would otherwise cost the company thousands of dollars in lost raw materials.

IDEM, OAQ has evaluated the information submitted and has determined that the fabric filters, bin vent, cyclones, and dust collector should not be considered an integral part of the compound, resin, and regrind storage silos load-in load-out process. This determination is based on the fact that the net economic benefit is minimal each year compared to the initial cost of the control equipment. In the sixth year of operating the control equipment, the annual raw material cost avoidance would exceed that of the initial cost and annual maintenance costs. Therefore, the permitting level will be determined using the potential to emit before the fabric filters, bin vent, cyclones, and dust collector for the compound, resin, and regrind storage silos load-in load-out process.

Enforcement Issues

On January 8, 2008, Westech Building Products, Inc. was issued a Notice of Violation. Enforcement action is pending the issuance of a Registration permit.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination –Registration

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

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Sixteen (16) Extruder Lines	0.00	0.00	0.00	0.00	3.26	0.00	0.08	negl.
Two (2) Mixers in Old Blend Room and One (1) Mixer in New Blend Room	1.69	0.84	0.00	0.00	0.07	0.00	0.05	negl.
Scrap Pipe Grinder	0.92	0.92	0.00	0.00	0.00	0.00	0.00	0.00
Sixteen (16) Propane Heat Guns	0.04	0.04	negl.	1.34	0.05	0.18	0.00	0.00
Sixteen (16) Cut off Saws	1.58	1.58	0.00	0.00	0.00	0.00	0.00	0.00
Twelve (12) Compound Storage Silos	5.63	2.81	0.00	0.00	0.00	0.00	0.00	0.00
Three (3) Resin Storage Silos	5.63	2.81	0.00	0.00	0.00	0.00	0.00	0.00
Five (5) Regrind Storage Silos	0.53	0.26	0.00	0.00	0.00	0.00	0.00	0.00
Thirteen (13) Microhoppers	0.28	0.14	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) Degreasers	0.00	0.00	0.00	0.00	0.58	0.00	0.00	negl.
Total PTE of Entire Source	**16.29**	**9.41**	**negl.**	**1.34**	**3.96**	**0.18**	**0.12**	**negl.**
Exemptions Levels	5	5	10	10	5 or 10	25	2.5	1
Registration Levels	25	25	25	25	25	100	-	-

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

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) This source is a compounding source that processes but does not manufacture polypropylene resins. Therefore the requirements of 40 CFR 60, Subpart DDD, Standards of Performance for

VOC Emissions from the Polymer Manufacturing Industry (326 IAC 12) are not included in the permit for this source.

(b) Polyvinyl Chloride (PVC) is not polymerized at this source. Therefore, the requirements of 40 CFR 61.60, Subpart F, National Emission Standard for Vinyl Chloride, and 40 CFR 63.210, Subpart J, National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production (326 IAC 12) are not included in the permit for this source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(d) This source is a resin compounding source. The source does not produce plastic composites. Therefore, the requirements of 40 CFR 63.5780, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (326 IAC 20-56), are not included in the permit for this source. In addition, the potential to emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.

(e) This source does not process or manufacture a thermoplastic product as defined by 40 CFR 63.1312. Therefore, the requirements of 40 CFR 63, Subpart JJJ, National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (326 IAC 20-21) are not included in the permit for this source. In addition, the potential to emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.

(f) The requirements of the National Emission Standards for Halogenated Solvent Cleaning (326 IAC 20-6, 40 CFR 63, Subpart T) are not included in this permit for the insignificant degreasing operations because these degreasing operations do not use a solvent containing methylene chloride, perchlorethylene, trichlorethylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.

(g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 326 IAC 20; 40 CFR Part 61 and 40 CFR Part 63) included in this permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

(a) 326 IAC 2-5.5 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

(c) 326 IAC 2-6 (Emission Reporting)

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

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

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

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

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

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

Cold Cleaner Operations

(i) 326 IAC 8-1-6 (New facilities; General reduction requirements)
Each facility at this source (constructed after 1980) has potential VOC emissions less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

(j) 326 IAC 8-3-2 (Cold Cleaner Operations)
The parts washer is subject to this rule because it was constructed after 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

(1) Equip the cleaner with a cover;
(2) Equip the cleaner with a facility for draining cleaned parts;
(3) Close the degreaser cover whenever parts are not being handled in the cleaner;
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) Provide a permanent, conspicuous label summarizing the operation requirements;
(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(k) 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)
The part washer is subject to this rule because it was constructed after July 1, 1990 in Posey County. This degreasing operation shall comply with the following requirements.

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

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

(i) 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 (38ºC) (one hundred degrees Fahrenheit (100ºF));
(ii) The solvent is agitated; or
(iii) The solvent is heated.

(b) 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 (38ºC) (one hundred degrees Fahrenheit (100ºF)), 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.

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

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

(e) 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 (38ºC) (one hundred degrees Fahrenheit (100ºF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9ºC) (one hundred twenty degrees Fahrenheit (120ºF)):

(i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(ii) A water cover when solvent is used is insoluble in, and heavier than, water.
(iii) 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.

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

(a) Close the cover whenever articles are not being handled in the degreaser.
(b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
(c) 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.

Individual Processes

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

(1) The particulate matter (PM) emissions from the following processes shall be limited by the following equation:

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

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

Emission Unit/Process	Process Weight Rate (lb/hr)	Allowable PM Emission Rate (326 IAC 6-3-2) (lb/hr)
(2) Mixers/Grinders in Old Blend Rm. (1) Mixer/Grinder in New Blend Rm.	12850	14.26
(16) Cut Off Saws	129	0.65
(12) Compound Storage Silos	12850	14.26
(3) Resin Storage Silos	12850	14.26
(5) Regrind Storage Silos	1200	2.91
(13) Microhoppers	12850	14.26

Allowable PM emission rate was calculated using the total throughput for all emission units per process.

Based on the PTE calculations before control, or after those controls deemed integral, all the above listed emission units are able to comply with the requirements of 326 IAC 6-3-2.

(2) The potential to emit of particulate emissions from scrap pipe grinder are less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), this unit is exempt from particulate emission limitations for manufacturing processes.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 23, 2008.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 129-26447-00029. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations

Company Name: Westech Building Products, Inc.
Address City IN Zip: 7451 Highway 62 East, Mt.Vernon, Indiana 47620
Permit No.: 129-26447-00029
Plt ID: 129-00029
Reviewer: Jason R. Krawczyk
Date: May 28, 2008

Uncontrolled Emission

Pollutant	PM	PM10	SO2	NOx	VOC	CO	HAPS
Emission Unit							
Sixteen (16) Extruder Lines	0.00	0.00	0.00	0.00	3.26	0.00	0.08
Sixteen (16) Propane Heat Guns	0.04	0.04	0.00	1.34	0.05	0.18	0.00
Two (2) Mixers in Old Blend Room/ (1) Mixer in New Blend Tower	1.69	0.84	0.00	0.00	0.07	0.00	0.05
Scrap Pipe Grinder	0.92	0.92	0.00	0.00	0.00	0.00	0.00
Sixteen (16) Cut Off saws	1.58	1.58	0.00	0.00	0.00	0.00	0.00
Twelve (12) Compound Storage Silos	5.63	2.81	0.00	0.00	0.00	0.00	0.00
Three (3) Resin Storage Silos	5.63	2.81	0.00	0.00	0.00	0.00	0.00
Five (5) Regrind Storage Silos	0.53	0.26	0.00	0.00	0.00	0.00	0.00
Thirteen (13) Microhoppers	0.28	0.14	0.00	0.00	0.00	0.00	0.00
Two (2) Degreasing Units	0.00	0.00	0.00	0.00	0.58	0.00	0.00
Total in TPY	**16.29**	**9.41**	**0.00**	**1.34**	**3.96**	**0.18**	**0.12**

Controlled Emission

Pollutant	PM	PM10	SO2	NOx	VOC	CO	HAPS
Emission Unit							
Sixteen (16) Extruder Lines	0.00	0.00	0.00	0.00	3.26	0.00	0.08
Sixteen (16) Propane Heat Guns	0.04	0.04	0.00	1.34	0.05	0.18	0.00
Two (2) Mixers in Old Blend Room/ (1) Mixer in New Blend Tower	1.69	0.84	0.00	0.00	0.07	0.00	0.05
Scrap Pipe Grinder	0.92	0.92	0.00	0.00	0.00	0.00	0.00
Sixteen (16) Cut off saws	1.58	1.58	0.00	0.00	0.00	0.00	0.00
Twelve (12) Compound Storage Silos	0.28	0.14	0.00	0.00	0.00	0.00	0.00
Three (3) Resin Storage Silos	0.28	0.14	0.00	0.00	0.00	0.00	0.00
Five (5) Regrind Storage Silos	0.03	0.01	0.00	0.00	0.00	0.00	0.00
Thirteen (13) Microhoppers	0.28	0.14	0.00	0.00	0.00	0.00	0.00
Two (2) Degreasing Units	0.00	0.00	0.00	0.00	0.58	0.00	0.00
Total in TPY	**5.09**	**3.81**	**0.00**	**1.34**	**3.96**	**0.18**	**0.12**

Note:
The control equipment for the blend rooms and microhoppers are considered integral to the process, therefore the potentials to emit after controls have been used in determining the permitting level.

Appendix A: Emissions Calculations
Extruder Lines

Company Name: Westech Building Products, Inc.
Address City IN Zip: 7451 Highway 62 East, Mt.Vernon, Indiana 47620
Permit No.: 129-26447-00029
Plt ID: 129-00029
Reviewer: Jason R. Krawczyk
Date: May 28, 2008

		Maximum Capacity			Emission Factor		Potential Emissions (TPY)	
Emission Unit ID	Extruder Model No.	lbs/hr	tons/year	MMlb/year	VOC (lb/MMlb)	HAPs (lb/ton PVC)	VOC	HAPs
EU-01A	TS100	1,000	4,380	8.76	58	0.00269	0.254	0.006
EU-01B	DSK62	600	2,628	5.26	58	0.00269	0.152	0.004
EU-02A	TS88	900	3,942	7.88	58	0.00269	0.229	0.005
EU-02B	CM55	400	1,752	3.50	58	0.00269	0.102	0.002
EU-03A	CM80	1,300	5,694	11.39	58	0.00269	0.330	0.008
EU-03B	CM55	400	1,752	3.50	58	0.00269	0.102	0.002
EU-04A	TP93	1,000	4,380	8.76	58	0.00269	0.254	0.006
EU-04B	CM55	400	1,752	3.50	58	0.00269	0.102	0.002
EU-05	TP93-26	990	4,336	8.67	58	0.00269	0.251	0.006
EU-06	DSK62	600	2,628	5.26	58	0.00269	0.152	0.004
EU-07	PR605-72R	675	2,957	5.91	58	0.00269	0.171	0.004
EU-08	DSK62	600	2,628	5.26	58	0.00269	0.152	0.004
EU-09	TTM98	1,560	6,833	13.67	58	0.00269	0.396	0.009
EU-10A	TS88	900	3,942	7.88	58	0.00269	0.229	0.005
EU-10B	DSK62	600	2,628	5.26	58	0.00269	0.152	0.004
EU-11A	TS88	900	3,942	7.88	58	0.00269	0.229	0.005
EU-11B	DSK62	600	2,628	5.26	58	0.00269	0.152	0.004
EU-12A	TS100	1,000	4,380	8.76	58	0.00269	0.254	0.006
EU-12B	DSK62	600	2,628	5.26	58	0.00269	0.152	0.004
EU-13A	TS100	1,000	4,380	8.76	58	0.00269	0.254	0.006
EU-13B	DSK62	600	2,628	5.26	58	0.00269	0.152	0.004
EU-14A	TTM98	1,560	6,833	13.67	58	0.00269	0.396	0.009
EU-14B	CON63	400	1,752	3.50	58	0.00269	0.102	0.002
EU-15	KMD 90-26	1,500	6,570	13.14	58	0.00269	0.381	0.009
EU-16A	KMD 90-26	1,500	6,570	13.14	58	0.00269	0.381	0.009
EU-16B	KDM 2-60	660	2,891	5.78	58	0.00269	0.168	0.004
	Total	22,245	97,433				5.65	0.13
	Bottlenecked Total	**12,850**	**56,283**				**3.26**	**0.076**

Note:
The maximum capacity of the dies is 56,283 tons per year, therefore a bottleneck occurs and the maximum capacity for the extruders is only 56,283 TPY
Emission Factor Development of VOC and HAPs for the PVC Pipe Manufacturing Industry performed by Rosengarten, Smith and Associates in December of 1995 for The Vinyl Institute.
No HAPs were detected in The Vinyl Institute study, the lower detection limit for the Gas Chromatograph was used for conservative estimates of HAPs (Vinyl Chloride Monomer, Benzene, Toluene).

Methodology:
Potential to Emit VOC in TPY = Emission Factor (lb/MMlb) * Maximum Capacity (MMlb/year)
Potential to Emit HAP in TPY = Emission Factor (lb/tons of PVC) * Maximum Capacity (tons of PVC/year)

Appendix A: Emissions Calculations
Propane Heat Guns

Company Name: Westech Building Products, Inc.
Address City IN Zip: 7451 Highway 62 East, Mt.Vernon, Indiana 47620
Permit No.: 129-26447-00029
Plt ID: 129-00029
Reviewer: Jason R. Krawczyk
Date: May 28, 2008

Heat Input Capacity
MMBtu/hr

2.0 from 16 Guns;
Each with a capacity of 0.125 MMBtu/hr

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	4.4E-03	4.4E-03	2.1E-04	0.15	5.3E-03	2.1E-02
Potential Emission in tons/yr	0.04	0.04	1.8E-03	1.34	4.6E-02	0.18

Methodology
MMBtu = 1,000,000 Btu
Potential to Emit in TPY = Emission Factor (lb/MMBtu) x Heat Input Capacity (MMBtu/hr) x 8,760 (hrs/yr) x 1/2000 (tons/lb)
Emission Factors are from AP 42, Chapter 1.5-1, Propane Commerical Boilers (SCC# 1-03-010-02).

Company Name: Westech Building Products, Inc.
Address City IN Zip: 7451 Highway 62 East, Mt.Vernon, Indiana 47620
Permit No.: 129-26447-00029
Plt ID: 129-00029
Reviewer: Jason R. Krawczyk
Date: May 28, 2008

Emission Unit	Maximum Capacity			Emission Factor				Uncontrolled Potential to Emit (TPY)			
	lbs/hr	Tons/year	MMlb/year	VOC (lb/MMlb)	PM10 (lb/ton)	PM (lb/ton)	HAPs (lb/ton PVC)	VOC	PM	PM10	HAPs
[(a)] Two (2) Mixers in Old Blend Room/ (1) Mixer in New Blend Tower*	12,850	56,283	112.57	1.2	0.30	0.60	0.00172	0.068	16.88	8.44	0.048
Scrap Pipe Grinder	1,200	5,256	10.51	--	0.35	0.35	--	--	0.920	0.920	--
Sixteen (16) Cut off saws***	129	563	1.13	--	5.60	5.60	--	--	1.58	1.58	--
Twelve (12) Compound Storage Silos*	12,850	56,283	112.57	--	0.10	0.20	--	--	5.63	2.81	--
Three (3) Resin Storage Silos*	12,850	56,283	112.57	--	0.10	0.20	--	--	5.63	2.81	--
Five (5) Regrind Storage Silos**	1,200	5,256	10.51	--	0.10	0.20	--	--	0.53	0.26	--
Thirteen (13) Microhoppers*	12,850	56,283	112.57	--	0.10	0.20	--	--	5.63	2.81	--
							Total in TPY	**0.07**	**36.79**	**19.64**	**0.05**

Emission Unit	Potential to Emit (TPY)				PM Control Efficiency	Controlled Emission (TPY)	
	VOC	PM	PM10	HAPs	%	PM	PM10
[(a)]Two (2) Mixers in Old Blend Room/ (1) Mixer in New Blend Tower*	0.068	16.88	8.44	0.048	90.00%	1.69	0.84
Scrap Pipe Grinder	--	0.920	0.920	--	--	0.920	0.920
Sixteen (16) Cut off saws*	--	1.58	1.58	--	--	1.58	1.58
Twelve (12) Compound Storage Silos*	--	5.63	2.81	--	95.00%	0.28	0.14
Three (3) Resin Storage Silos*	--	5.63	2.81	--	95.00%	0.28	0.14
Five (5) Regrind Storage Silos**	--	0.53	0.26	--	95.00%	0.03	0.01
Thirteen (13) Microhoppers*	--	5.63	2.81	--	95.00%	0.28	0.14
Total (Tons/yr)	**0.11**	**36.79**	**19.64**	**0.05**		**5.05**	**3.78**

Note:
* The maximum capacity of the dies is 56,283 tons per year, therefore a bottleneck occurs and the maximum capacity for the mixers, cutt off saws, compound silos, resin silos, and microhoppers is only 56,283 TPY
** The maximum capacity of the scrap grinder is 5,256 therefore, a bottleneck occurs and the maximum capcity for the regrind storage silos is 5,256 TPY
*** Of the 56,283 TPY maximum capacity for the cutt off saws approximately only 563 tons per year will be product loss. Therefore the product loss was used to determine the annual emissions.
[(a)] The control equipment for the blend rooms and microhoppers are considered integral to the process, therefore the potentials to emit after controls have been used in determining the permitting level.
The PM and PM10 emission factors used in mixing and blending operations are from the FIRE database (SCC 3-05-012-23) for fiberglass manufacturing, raw material mixing and weighing.
The VOC and HAP emission factors for mixing and blending operations basedon the analytical test report study "Emission Factor Development for the PVC Pipe Manufacturing Industry".
The PM and PM10 emission factors used in grinding and sawing operation with the most comparable process in the FIRE database is Log Sawing (SCC 3-07-008-02).
The PM and PM10 emission factors used in silos are from the FIRE database (SCC 3-01-018-11).

Methodology:
VOC Emission (tons/year) = Maximum Capacity (MMlb/yr) x Emission Factor (lb/MMlb) x 0.0005 tons/lb
PM/PM10 Emission (ton/year) = Maximum Capacity (Tons/yr) x Emission Factor (lb/ton) x 0.0005 tons/lb

Appendix A: Emission Calculations
VOC Emissions
From Cold Cleaners

Company Name: Westech Building Products, Inc.
Address City IN Zip: 7451 Highway 62 East, Mt.Vernon, Indiana 47620
Permit No.: 129-26447-00029
Plt ID: 129-00029
Reviewer: Jason R. Krawczyk
Date: May 28, 2008

One (1) Cold Cleaning Degreasing Operation

Material	Process	Density (lb/gal)*	Annual Usage (gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non Volatiles (Solids)	Gal of Mat (gal/day)	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)
Safety Kleen	Degreasers	8.00	145	100.00%	0.00%	100.00%	0.00%	0.00%	0.40	0.13	3.18	0.58
									Total:			

Notes:
* Annual usage (gal) determined from source data of 0.58 TPY emissions VOC and Safety Kleen MSDS information.

Methodology:
Gallons of Material (gal/day) = Annual emissions / 365
Potential VOC (lb/hr) = Annual Emissions x Density / 8760 hrs/yr
Potential VOC (lb/day) = Potential VOC (lb/hr) * 24
Potential VOC (tons/yr) = Annual Emissions * Density / 2000lbs