



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: February 6, 2009

RE: PVC Compounders LLC / 113-28047-00053

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

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**PVC Compounders LLC
4230 E US 6
Kendallville, Indiana 46755**

(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.

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

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

Operation Permit No.: M113-28047-00053	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 6, 2009 Expiration Date: February 6, 2019

TABLE OF CONTENTS

A. SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary

B. GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-1.1-1]
- B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]
- B.4 Enforceability
- B.5 Severability
- B.6 Property Rights or Exclusive Privilege
- B.7 Duty to Provide Information
- B.8 Certification
- B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]
- B.10 Preventive Maintenance Plan [326 IAC 1-6-3]
- B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]
- B.13 Permit Renewal [326 IAC 2-6.1-7]
- B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
- B.15 Source Modification Requirement
- B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
- B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
- B.18 Annual Fee Payment [326 IAC 2-1.1-7]
- B.19 Credible Evidence [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
- C.2 Permit Revocation [326 IAC 2-1.1-9]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

- C.10 Compliance Monitoring [326 IAC 2-1.1-11]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11]

Corrective Actions and Response Steps

- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS

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

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

Compliance Determination Requirements

- D.1.2 Particulate Control

Certification

Annual Notification

Malfunction Report

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary custom compounding of purchased resins.

Source Address:	4230 E US 6, Kendallville, Indiana 46755
Mailing Address:	4230 E US 6, Kendallville, Indiana 46755
General Source Phone Number:	260-347-4055
SIC Code:	3087
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Four (4) natural gas-fired space heaters, identified as H1 through H4, constructed in 1974, rated at 0.2 million British thermal units per hour, each.
- (b) Two (2) natural gas-fired space heaters, identified as H5 and H6, constructed in 1974, rated at 0.09 million British thermal units per hour, each.
- (c) One (1) flame cutting operation, capacity: twenty (20) inches of 0.375 inch thick metal per minute.
- (d) One (1) stick welding operation, capacity: 5,475 pounds of electrodes per year.
- (e) One (1) dry product storage and transfer operation, constructed in 1974 and 1975, equipped with baghouses F1, F2A through F2D and F3 through F5 for particulate control, including:
 - (1) six (6) storage tanks, identified as T-1 through T-6;
 - (2) two (2) storage tanks, identified as T-7 and T-8;
 - (3) two (2) storage tanks, identified as A and B;
 - (4) one (1) storage tank, identified as C;
 - (5) one (1) tank;
 - (6) two (2) PVC extruders, identified as EX-1 and EX-2, equipped with one (1) cyclone delivery system with a baghouse dust collector;

- (7) one (1) delivery system;
 - (8) one (1) delivery system;
 - (9) one (1) cyclone/baghouse;
 - (10) two (2) separators;
 - (11) three (3) chillers, identified as CH-1 through CH-3;
 - (12) one (1) air compressor, identified as AC-1;
 - (13) two (2) grinders, identified as G-1 and G-2; and
 - (14) one (1) miscellaneous storage area, equipped with one (1) baghouse dust collector, identified as F2.
- (f) Unpaved roads for employee vehicles.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M113-28047-00053, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability

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

B.5 Severability

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

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

B.7 Duty to Provide Information

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

B.8 Certification

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

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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.10 Preventive Maintenance Plan [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) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M113-28047-00053 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Four (4) natural gas-fired space heaters, identified as H1 through H4, constructed in 1974, rated at 0.2 million British thermal units per hour, each.
- (b) Two (2) natural gas-fired space heaters, identified as H5 and H6, constructed in 1974, rated at 0.09 million British thermal units per hour, each.
- (c) One (1) flame cutting operation, capacity: twenty (20) inches of 0.375 inch thick metal per minute.
- (d) One (1) stick welding operation, capacity: 5,475 pounds of electrodes per year.
- (e) One (1) dry product storage and transfer operation, constructed in 1974 and 1975, equipped with baghouses F1, F2A through F2D and F3 through F5 for particulate control, including:
 - (1) six (6) storage tanks, identified as T-1 through T-6;
 - (2) two (2) storage tanks, identified as T-7 and T-8;
 - (3) two (2) storage tanks, identified as A and B;
 - (4) one (1) storage tank, identified as C;
 - (5) one (1) tank;
 - (6) two (2) PVC extruders, identified as EX-1 and EX-2, equipped with one (1) cyclone delivery system with a baghouse dust collector;
 - (7) one (1) delivery system;
 - (8) one (1) delivery system;
 - (9) one (1) cyclone/baghouse;
 - (10) two (2) separators;
 - (11) three (3) chillers, identified as CH-1 through CH-3;
 - (12) one (1) air compressor, identified as AC-1;
 - (13) two (2) grinders, identified as G-1 and G-2; and
 - (14) one (1) miscellaneous storage area, equipped with one (1) baghouse dust collector, identified as F2.
- (f) Unpaved roads for employee vehicles.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) dry product storage and transfer operation shall not exceed 9.9 pounds per hour, when operating at a process weight rate of 7,413.95 pounds per hour.

This limitation was calculated using the following equation:

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

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

Compliance Determination Requirements

D.1.2 Particulate Control

- (a) In order to comply with Condition D.1.1, the baghouse for particulate control shall be in operation and control emissions from the sanding and finishing operations at all times that the dry product storage and transfer facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced.

The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

There are no compliance monitoring conditions specifically applicable to these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

There are no record keeping and reporting requirements specifically applicable to these facilities.

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

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

Source Name: PVC Compounders LLC
Source Address: 4230 E US 6, Kendallville, Indiana 46755
Mailing Address: 4230 E US 6, Kendallville, Indiana 46755
MSOP No.: M113-28047-00053

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	PVC Compounders LLC
Address:	4230 E US 6
City:	Kendallville, Indiana 46755
Phone #:	260-347-4055
MSOP #:	M113-28047-00053

I hereby certify that PVC Compounders LLC is :

still in operation.

no longer in operation.

I hereby certify that PVC Compounders LLC is :

in compliance with the requirements of MSOP M113-28047-00053.

not in compliance with the requirements of MSOP M113-28047-00053.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

**Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) Renewal**

Source Background and Description

Source Name:	PVC Compounders LLC
Source Location:	4230 E US 6, Kendallville, IN 46755
County:	Noble
SIC Code:	3087
Permit Renewal No.:	113-28047-00053
Permit Reviewer:	Iryn Calilung/Christina Lowry

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from PVC Compounders LLC relating to the operation of a stationary custom compounding of purchased resin source.

History

On October 23, 2008, PVC Compounders LLC (formerly known as PVC Compounders Inc.) submitted an application to the OAQ requesting to renew its operating permit. PVC Compounders LLC was issued a MSOP on May 29, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emissions units:

- (a) Four (4) natural gas-fired space heaters, identified as H1 through H4, constructed in 1974, rated at 0.2 million British thermal units per hour, each.
- (b) Two (2) natural gas-fired space heaters, identified as H5 and H6, constructed in 1974, rated at 0.09 million British thermal units per hour, each.
- (c) One (1) flame cutting operation, capacity: twenty (20) inches of 0.375 inch thick metal per minute.
- (d) One (1) stick welding operation, capacity: 5,475 pounds of electrodes per year.
- (e) One (1) dry product storage and transfer operation, constructed in 1974 and 1975, equipped with baghouses F1, F2A through F2D and F3 through F5 for particulate control, including:
 - (1) six (6) storage tanks, identified as T-1 through T-6;
 - (2) two (2) storage tanks, identified as T-7 and T-8;
 - (3) two (2) storage tanks, identified as A and B;
 - (4) one (1) storage tank, identified as C;
 - (5) one (1) tank;

- (6) two (2) PVC extruders, identified as EX-1 and EX-2, equipped with one (1) cyclone delivery system with a baghouse dust collector;
 - (7) one (1) delivery system;
 - (8) one (1) delivery system;
 - (9) one (1) cyclone/baghouse;
 - (10) two (2) separators;
 - (11) three (3) chillers, identified as CH-1 through CH-3;
 - (12) one (1) air compressor, identified as AC-1;
 - (13) two (2) grinders, identified as G-1 and G-2; and
 - (14) one (1) miscellaneous storage area, equipped with one (1) baghouse dust collector, identified as F2.
- (f) Unpaved roads for employee vehicles.

Emission Units and Pollution Control Equipment Removed From the Source

The cold cleaner degreaser has been removed since the last permit was issued.

Existing Approvals

Since the issuance of the MSOP 113-14965-00053 on May 29, 2003, the source has neither constructed nor been operating under any additional approvals.

Enforcement Issue

- (a) In accordance with 326 IAC 2-6.1-7(b), a timely renewal application is one that is submitted at least one hundred twenty (120) calendar days before the expiration of an existing operating permit. PVC Compounders LLC's permit expired on May 29, 2008. However, the source's renewal permit was not received by IDEM until October 23, 2008.
- (b) IDEM is reviewing this matter and will take appropriate action.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Noble County.

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

(a) Ozone Standards

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

(b) PM_{2.5}

Noble County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

Noble County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂ and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential to Emit including Fugitive Emissions (tons/year)	Potential to Emit excluding Fugitive Emissions (tons/year)
PM	144	91.6
PM ₁₀ ⁽¹⁾	109	56.2
PM _{2.5} ⁽²⁾	109	56.2
SO ₂	0.003	0.003
VOC	56.2	56.2
CO	0.361	0.361
NO _x	0.429	0.429

(1) 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".

(2) PM_{2.5} is considered equivalent to PM₁₀.

HAPs	Potential To Emit (tons/year)
Antimony	0.182
Lead	2.83
Manganese	0.001
Nickel	0.002
Chromium	0.0006
Benzene	9.01E-6
Dichlorobenzene	5.15E-6
Formaldehyde	0.0003
Hexane	0.0077
Toluene	1.46E-5
Cadmium	4.72E-6
TOTAL	3.02

- (a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC, PM and PM₁₀ (excluding fugitive emissions) are equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1, MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of nonfugitive PM₁₀ is less than one hundred (100) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7, Part 70.

- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Space Heaters	0.008	0.033	0.033	0.003	0.429	0.024	0.361	-	-
Welding and Flame Cutting	0.377	0.377	0.377	-	-	-	-	-	-
Dry Product Storage and Transfer	43.4	43.4	43.4	-	-	56.1	-	-	-
Unpaved Roads	47.8	12.4	12.4	-	-	-	-	-	-
Total PTE of Entire Source	91.6	56.2	56.2	0.003	0.429	56.2	0.361	3.02	2.83
PSD Major Source Thresholds	NA	100	100	100	100	100	100	25	10
Emission Offset/ Nonattainment NSR Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

All values in the table represent the maximum unrestricted potential emissions, except particulate emissions from the dry product storage and transfer.

PM_{2.5} emissions from this process are assumed to be equal to PM₁₀ emissions.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

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

- (c) This source does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate). Therefore, the requirements of 40 CFR 60.560, Subpart DDD, are not applicable.
- (d) The storage tanks at this source do not store volatile organic liquids. Therefore, the requirements of 60 CFR 60.110b, Subpart Kb, are not applicable.
- (e) This source is not subject to 40 CFR 61, Subpart F, because the source does not produce vinyl chloride by any process, or polymers containing any fraction of polymerized vinyl chloride.
- (f) This source is not subject to 40 CFR 63, Subpart F, because the source does not contain any chemical manufacturing process units.
- (g) The source is not subject to the requirements of 40 CFR 63, Subpart J, National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers production because this source is not a major source of HAPs.
- (h) This source is not subject to the requirements of 40 CFR 63, Subpart U, because it does not produce an elastomer product as defined in 40 CFR 63.482.
- (i) This source is not subject to the requirements of 40 CFR 63, Subpart W, because it does not manufacture basic liquid epoxy resins or wet strength resins as defined by 40 CFR 63.522.
- (j) This source is not subject to the requirements of 40 CFR 63, Subpart JJJ, because it does not produce a thermoplastic product as defined in 40 CFR 63.1312.
- (k) This source is not subject to the requirements of 40 CFR 63.1400, because it does not produce amino/phenolic resin as defined in 40 CFR 63.1402.
- (l) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.
- (m) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs).
- (n) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The requirements of CAM are not applicable to this source. The source does not have any emission units that meet the above criteria. Furthermore, the CAM requirements are only applicable to Title V permits and this permit is a MSOP Renewal.

State Rule Applicability - Entire Source

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

Construction of this source, which commenced prior to August 7, 1977, was not subject to the PSD requirements of 326 IAC 2-2. In addition, the maximum unrestricted potential emissions of each criteria pollutant are less than 250 tons per year. Therefore, this source is not a major source pursuant to 326 IAC 2-2, PSD, and the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Noble County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

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 6-5 (Fugitive Particulate Matter Emission Limitations)

Since this source was constructed and operated prior to December 13, 1985, the requirements of 326 IAC 6-5 are not applicable.

State Rule Applicability - Individual Facilities

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

- (a) The welding station at this source consumes less than 625 pounds of weld wire or rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3.
- (b) The flame cutting operation at this source cuts less than 3,400 inches per hour of stock one (1) inch thick or less. Therefore, pursuant to 326 IAC 6-3-1(b)(10), the flame cutting is exempt from the requirements of 326 IAC 6-3.
- (c) The particulate from the one (1) dry product storage and transfer operation shall not exceed 9.9 pounds per hour, when operating at a process weight rate of 7,413.95 pounds per hour. Since the potential to emit particulate after control by the baghouses (F1, F2A

through F2D and F3 through F5) is 9.9 pounds per hour, the one (1) dry product storage and transfer operation will comply with this rule. The baghouses must be in operation at all times when the one (1) dry product storage and transfer is in operation. This limitation is based on 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:

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

326 IAC 8-1-6 (New facilities; General reduction requirements)

This source was constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The potential VOC emissions from this source are less than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are not applicable.

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

The storage tanks at this source do not store volatile organic liquids. Therefore, the requirements of 326 IAC 8-9 are not applicable.

Conclusion

The operation of this custom compounding of purchased resins source shall be subject to the conditions of the attached proposed Minor Source Operating Permit Renewal 113-28047-00053.

**Appendix A: Emission Calculations
Summary Emissions**

**Company Name: PVC Compounders LLC
Address City IN Zip: 4230 E US 6 Kendallville, Indiana 46755
MSOP: 113-28047-00053
Reviewer: Iryn Calilung/Christina Lowry**

**SUMMARY
Potential Emissions Before Controls (TPY)**

Process/Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Space Heaters	0.008	0.033	0.033	0.003	0.429	0.024	0.361	-	-
Welding and Flame Cutting	0.377	0.377	0.377	-	-	-	-	-	-
Dry Product Storage and Transfer	95.7	95.7	95.7	-	-	56.1	-	-	-
Unpaved Roads	47.8	12.4	12.4	-	-	-	-	-	-
Total	144	109	109	0.003	0.429	56.2	0.361	3.02	2.83

**SUMMARY
Potential Emissions After Controls (TPY)**

Process/Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Space Heaters	0.008	0.033	0.033	0.003	0.429	0.024	0.361	-	-
Welding and Flame Cutting	0.377	0.377	0.377	-	-	-	-	-	-
Dry Product Storage and Transfer	43.4	43.4	43.4	-	-	56.1	-	-	-
Unpaved Roads	47.8	12.4	12.4	-	-	-	-	-	-
Total	91.6	56.2	56.2	0.003	0.429	56.2	0.361	3.02	2.85

**Appendix A: Emission Calculations
Process Operations from Dry Product Storage and Transfer**

**Company Name: PVC Compounders LLC
Address City IN Zip: 4230 E US 6 Kendallville, Indiana 46755
MSOP: 113-28047-00053
Reviewer: Iryn Calilung/Christina Lowry**

Process	Total Before Controls	Total After Controls
Total PM Emissions		
lbs/hr	21.9	9.9
tons/yr	95.7	43.4
Antimony Compound Emissions		
lbs/hr	0.042	0.008
tons/yr	0.182	0.037
Lead Compound Emissions		
lbs/hr	0.645	0.129
tons/yr	2.83	0.565
Subtotal VOC Emissions from product handling and storage		
lbs/hr	3.55	3.55
tons/yr	15.5	15.5
Extruders Fugitive VOC		
lbs/hr	6.89	6.89
tons/yr	30.2	30.2
Breathing Loss (Tanks 1 - 8)		
lbs/hr	0.24	0.24
tons/yr	1.05	1.05
Working Loss (Tanks 1 - 8)		
lbs/hr	2.15	2.15
tons/yr	9.42	9.42
Total VOC		
lbs/hr	12.8	12.8
tons/yr	56.1	56.1

Methodology

Calculations from CP 113-5442-00053, issued on September 12, 2996, based on confidential information, have been determined correct and accurate.

The emissions are summarized here.

Tons/year = (lbs/hr) x (8760 hr/yr) x (ton/2000lbs)

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

**Company Name: PVC Compounders LLC
Address City IN Zip: 4230 E US 6 Kendallville, Indiana 46755
MSOP: 113-28047-00053
Reviewer: Iryn Calilung/Christina Lowry**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Four (4) natural gas-fired space heaters, H1 through H4, rated at 0.2 MMBtu/hr, each. Two (2) natural gas-fired space heaters, H5 and H6, rated at 0.09 MMBtu/hr, each.
0.980	8.58	

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.008	0.033	0.003	0.429	0.024	0.361

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 4 for HAPs emissions calculations.

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

**Company Name: PVC Compounders LLC
 Address City IN Zip: 4230 E US 6 Kendallville, Indiana 46755
 MSOP: 113-28047-00053
 Reviewer: Iryn Caillung/Christina Lowry**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.01E-06	5.15E-06	3.22E-04	7.73E-03	1.46E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	2.15E-06	4.72E-06	6.01E-06	1.63E-06	9.01E-06	0.008

Methodology is the same as page 3.

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

Appendix A: Welding and Thermal Cutting

Company Name: PVC Compounders LLC
 Address City IN Zip: 4230 E US 6 Kendallville, Indiana 46755
 MSOP: 113-28047-00053
 Reviewer: Iryn Calilung/Christina Lowry

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Stick (E7018 electrode)	1.00	0.625		0.0211				0.0132	0.00	0.00	0.00	0.00
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1.00	0.375	20.0	0.162	0.0005	0.0001	0.0003	0.0730	0.0002	0.00005	0.0001	0.0004
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.0862	0.0002	0.00005	0.0001	0.0004
Potential Emissions lbs/day								2.07	0.00540	0.0011	0.0032	0.0097
Potential Emissions tons/year								0.377	0.0010	0.0002	0.0006	0.002

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

**Appendix A: Emission Calculations
Unpaved Roads**

**Company Name: PVC Compounders LLC
Address City IN Zip: 4230 E US 6 Kendallville, Indiana 46755
MSOP: 113-28047-00053
Reviewer: Iryn Calilung/Christina Lowry**

**** unpaved roads ****

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

Employee passenger cars

160.0 trips/day x
0.50 miles/roundtrip x
366 days/yr = 29280 miles per year

For PM	For PM-10		
3.26	$E_f = \{k \cdot [(s/12)^{0.8}] \cdot [(W/3)^b] \cdot [(M_{dry}/0.2)^c] \cdot [(365-p)/365]\}$		
10	= 0.85 lb/mile		
5	where k = 2.6 r for PM-10 (k=10 for PM-30 or TSP)		
0.5	s = 5 t content of unpaved roads		
0.4	b = 0.4 / -10 (b = 0.5 for PM-30 or TSP)		
3	c = 0.3 / -10 (c = 0.4 for PM-30 or TSP)		
0.2	W = 3 average vehicle weight		
125	Mdry = 0.2 content, % (default is 0.2 for dry conditions)		
	p = 125 .254mm of precipitation (See Figure 13.2.2-1)		
	<u>3.26 lb/mi x 29280 mi/yr =</u>	PM	<u>47.8 tons/yr</u>
	2000 lb/ton		
	<u>0.85 lb/mi x 29280 mi/yr =</u>	PM-10	<u>12.4 tons/yr</u>
	2000 lb/ton		