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: January 21, 2010

RE: Dorel Juvenile Group, Inc / 005-28577-00102

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

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REGISTRATION
OFFICE OF AIR QUALITY

Dorel Juvenile Group, Inc.
2525 State Street,
Columbus, IN 47201

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. 005-28577-00102	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 21, 2010

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 injection molding source.

Source Address:	2525 State St., Columbus, IN 47201
Mailing Address:	2525 State St., Columbus, IN 47201
General Source Phone Number:	812-314-4277
SIC Code:	3089
County Location:	Bartholomew 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) Ninety-six (96) injection molding machines, uncontrolled and exhausting to the inside of the building, and including:

(1) Eight (8) Injection Molding Machines, installed prior to 1964, and including the following:

(A) One (1) HPM Injection Molding Machine, identified as Dorel Machine #217, with a maximum throughput rate of one hundred twenty-six and fifteen hundredths (126.15) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #218, with a maximum throughput rate of one hundred forty-six and thirty-nine hundredths (146.39) pounds of resin per hour;

(C) Four (4) Van Dorn Injection Molding Machine, identified as Dorel Machine #s 301, 302, 304 and 306, with a maximum throughput rate of twenty-two and sixty-six hundredths (22.66) pounds of resin per hour, each;

(D) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #305, with a maximum throughput rate of nineteen and eighty-two hundredths (19.82) pounds of resin per hour; and

(E) One (1) Natco Injection Molding Machine, identified as Dorel Machine #311, with a maximum throughput rate of forty-six and twenty-six hundredths (46.26) pounds of resin per hour.

(2) One (1) Natco Injection Molding Machines, identified as Dorel Machine #509, installed in 1964, with a maximum throughput rate of two hundred thirteen and forty-nine hundredths (213.49) pounds of resin per hour;

(3) One (1) Natco Injection Molding Machines, identified as Dorel Machine #507, installed in 1966, with a maximum throughput rate of one hundred fifty-two and forty-nine hundredths (152.49) pounds of resin per hour;

(4) Three (3) Injection Molding Machines, installed in 1967, and including the following:

(A) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #303, with a maximum throughput rate of twenty-six and forty-three hundredths (26.43) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #506, with a maximum throughput rate of one hundred forty-six and thirty-nine hundredths (146.39) pounds of resin per hour; and

(C) One (1) Natco Injection Molding Machine, identified as Dorel Machine #508, with a maximum throughput rate of two hundred twenty-eight and seventy-four hundredths (228.74) pounds of resin per hour.

(5) Three (3) Injection Molding Machines, installed in 1969, and including the following:

(A) One (1) Natco Injection Molding Machine, identified as Dorel Machine #203, with a maximum throughput rate of one hundred ninety-one and sixty-three hundredths (191.63) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #204, with a maximum throughput rate of two hundred thirty-four and fifty-eight hundredths (234.58) pounds of resin per hour; and

(C) One (1) Natco Injection Molding Machine, identified as Dorel Machine #219, with a maximum throughput rate of ninety-eight and eighty-one hundredths (98.81) pounds of resin per hour.

(6) Two (2) Injection Molding Machines, installed in 1979, and including the following:

(A) One (1) Cincinnati Injection Molding Machine, identified as Dorel Machine #220, with a maximum throughput rate of two hundred eighteen and six hundredths (218.06) pounds of resin per hour; and

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #310, with a maximum throughput rate of forty-six and twenty-six hundredths (46.26) pounds of resin per hour.

(7) One (1) Natco Injection Molding Machine, identified as Dorel Machine #207, installed in 1982, with a maximum throughput rate of ninety-four and fifty-four hundredths (94.54) pounds of resin per hour;

(8) One (1) Natco Injection Molding Machine, identified as Dorel Machine #212, installed in 1983, with a maximum throughput rate of three hundred thirty-eight and eighty-one hundredths (338.81) pounds of resin per hour;

(9) One (1) Natco Injection Molding Machine, identified as Dorel Machine #213, installed in 1988, with a maximum throughput rate of two hundred eighty-six and sixty-eight hundredths (286.68) pounds of resin per hour;

(10) Two (2) Injection Molding Machines, installed in 1992, and including the following:

(A) One (1) HPM Injection Molding Machine, identified as Dorel Machine #201, with a maximum throughput rate of sixty and seventy-nine hundredths (60.79) pounds of resin per hour; and

(B) One (1) HPM Injection Molding Machine, identified as Dorel Machine #202, with a maximum throughput rate of one hundred thirty-one and twenty-eight hundredths (131.28) pounds of resin per hour.

(11) Three (3) Injection Molding Machines, installed in 1993, and including the following:

(A) One (1) HPM Injection Molding Machine, identified as Dorel Machine #133, with a maximum throughput rate of two hundred forty-four and forty-four hundredths (244.44) pounds of resin per hour;

(B) One (1) HPM Injection Molding Machine, identified as Dorel Machine #206, with a maximum throughput rate of ninety-nine and twelve hundredths (99.12) pounds of resin per hour; and

(C) One (1) HPM Injection Molding Machine, identified as Dorel Machine #209, with a maximum throughput rate of eighty-five and ninety hundredths (85.90) pounds of resin per hour.

(12) One (1) HPM Injection Molding Machines, identified as Dorel Machine #132, installed in 1994, with a maximum throughput rate of two hundred fifty-five and thirty-three hundredths (255.33) pounds of resin per hour;

(13) Four (4) Injection Molding Machines, installed in 1997, and including the following:

(A) One (1) Natco Injection Molding Machine, identified as Dorel Machine #205, with a maximum throughput rate of two hundred nineteen and fifty-nine hundredths (219.59) pounds of resin per hour;

(B) One (1) HPM Injection Molding Machine, identified as Dorel Machine #312, with a maximum throughput rate of thirty- one and seventy-two hundredths (31.72) pounds of resin per hour;

(C) One (1) HPM Injection Molding Machine, identified as Dorel Machine #323, with a maximum throughput rate of seventy-nine and thirty hundredths (79.30) pounds of resin per hour;

(D) One (1) HPM Injection Molding Machine, identified as Dorel Machine #324, with a maximum throughput rate of seventy-five and thirty-three hundredths (75.33) pounds of resin per hour;

(14) Five (5) Injection Molding Machines, installed in 1998, and including the following:

(A) One (1) Natco Injection Molding Machine, identified as Dorel Machine #135, with a maximum throughput rate of two hundred seventy-six and five hundredths (276.05) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #136, with a maximum throughput rate of two hundred forty-four and eighty-two hundredths (244.82) pounds of resin per hour;

(C) One (1) Natco Injection Molding Machine, identified as Dorel Machine #208, with a maximum throughput rate of seventy-nine and thirty hundredths (79.30) pounds of resin per hour;

(D) One (1) HPM Injection Molding Machine, identified as Dorel Machine #211, with a maximum throughput rate of eighty-two and ninety hundredths (82.90) pounds of resin per hour;

(E) One (1) Natco Injection Molding Machine, identified as Dorel Machine #214, with a maximum throughput rate of ninety-seven and fifty-nine hundredths (97.59) pounds of resin per hour;

(15) Two (2) Injection Molding Machines, installed in 1999, and including the following:

(A) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #307, with a maximum throughput rate of twenty-two and sixty-six hundredths (22.66) pounds of resin per hour;

(B) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #321, with a maximum throughput rate of thirty-three and eighty-nine hundredths (34.89) pounds of resin per hour;

(16) Three (3) Injection Molding Machines, installed in 2000, and including the following:

(A) One (1) Natco Injection Molding Machine, identified as Dorel Machine #102, with a maximum throughput rate of two hundred forty-seven and fifty hundredths (247.50) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #130, with a maximum throughput rate of two hundred fifty-two and seventy-five hundredths (252.75) pounds of resin per hour;

(C) One (1) Natco Injection Molding Machine, identified as Dorel Machine #131, with a maximum throughput rate of two hundred fifty-seven and seventy-one hundredths (257.71) pounds of resin per hour;

(17) Three (3) Injection Molding Machines, installed in 2001, and including the following:

(A) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #322, with a maximum throughput rate of thirty-four and eighty-nine hundredths (34.89) pounds of resin per hour;

(B) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #403, with a maximum throughput rate of seventy-one and eighty hundredths (71.80) pounds of resin per hour;

(C) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #404, with a maximum throughput rate of seventy-five and thirty-three hundredths (75.33) pounds of resin per hour;

(18) Forty-one (41) Injection Molding Machines, installed in 2003, and including the following:

(A) One (1) Mitsubishi Injection Molding Machine, identified as Dorel Machine #103, with a maximum throughput rate of three hundred and ten fifty-seven hundredths (310.57) pounds of resin per hour;

(B) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #104, with a maximum throughput rate of one hundred sixty-five and twenty hundredths (165.20) pounds of resin per hour;

(C) Four (4) Mitsubishi Injection Molding Machines, identified as Dorel Machine #s 105, 106, 108, and 109, with a maximum throughput rate of two hundred sixty-six and twenty-one hundredths (266.21) pounds of resin per hour, each;

(D) Five (5) Milacron Injection Molding Machines, identified as Dorel Machine #s 107, 110, 112, 114, and 115, with a maximum throughput rate of three hundred seventeen and eighteen hundredths (317.18) pounds of resin per hour, each;

(E) Two (2) Milacron Injection Molding Machines, identified as Dorel Machine #s 111 and 116, with a maximum throughput rate of two hundred ninety-two and seventy-eight hundredths (292.78) pounds of resin per hour, each;

(F) One (1) Mitsubishi Injection Molding Machine, identified as Dorel Machine #210, with a maximum throughput rate of one hundred one and thirty-two hundredths (101.32) pounds of resin per hour;

(G) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #308, with a maximum throughput rate of fifteen and eighty-six (15.86) pounds of resin per hour;

(H) One (1) Toshiba Injection Molding Machine, identified as Dorel Machine #313, with a maximum throughput rate of fifty-nine and forty-seven hundredths (59.47) pounds of resin per hour;

(I) One (1) Toshiba Injection Molding Machine, identified as Dorel Machine #314, with a maximum throughput rate of fifty-five and fifty-one hundredths (55.51) pounds of resin per hour;

(J) One (1) Toshiba Injection Molding Machine, identified as Dorel Machine #315, with a maximum throughput rate of forty-three and sixty-one hundredths (43.61) pounds of resin per hour;

(K) Three (3) Milacron Injection Molding Machines, identified as Dorel Machine #400, 401, and 402, with a maximum throughput rate of one hundred seven and eighty-four hundredths (107.84) pounds of resin per hour, each;

(L) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #408, with a maximum throughput rate of forty-nine and sixteen hundredths (49.16) pounds of resin per hour;

(M) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #409, with a maximum throughput rate of fifty-four and sixty-three hundredths (54.63) pounds of resin per hour;

(N) Three (3) Milacron Injection Molding Machines, identified as Dorel Machine #s 410, 411, 433, and with a maximum throughput rate of forty-four and sixty-nine hundredths (44.69) pounds of resin per hour, each;

(O) Two (2) Mitsubishi Injection Molding Machines, identified as Dorel Machine #s 421 and 423, with a maximum throughput rate of ninety-one and ninety-eight (91.98) pounds of resin per hour, each;

(P) Two (2) Mitsubishi Injection Molding Machines, identified as Dorel Machine #s 422 and 424, with a maximum throughput rate of eighty-three and sixty-two hundredths (83.62) pounds of resin per hour, each;

(Q) One (1) Mitsubishi and One (1) Milacron Injection Molding Machine, identified as Dorel Machine #425 and 503, with a maximum throughput rate of one hundred three and eighty-eight (103.88) pounds of resin per hour, each;

(R) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #429, with a maximum throughput rate of eighty-two and forty-seven hundredths (82.47) pounds of resin per hour;

(S) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #430, with a maximum throughput rate of one hundred fifty-eight and fifty-nine hundredths (158.59) pounds of resin per hour;

(T) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #431, with a maximum throughput rate of one hundred sixty-six and fifty-two hundredths (166.52) pounds of resin per hour;

(U) Two (2) Milacron Injection Molding Machines, identified as Dorel Machine #s 432 and 504, with a maximum throughput rate of one hundred seven and five hundredths (107.05) pounds of resin per hour, each;

(V) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #501, with a maximum throughput rate of two hundred fifty-nine and fifty-one hundredths (259.51) pounds of resin per hour;

(W) Two (2) Milacron Injection Molding Machines, identified as Dorel Machine #s 502 and 523, with a maximum throughput rate of eighty-nine and twenty-one hundredths (89.21) pounds of resin per hour, each;

(X) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #505, with a maximum throughput rate of ninety-nine and twelve hundredths (99.12) pounds of resin per hour; and

(Y) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #524, with a maximum throughput rate of two hundred sixty three and twelve hundredths (263.12) pounds of resin per hour.

(19) Ten (10) Injection Molding Machines, installed in 2004, and including the following:

(A) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #319, with a maximum throughput rate of twenty-six and forty-three hundredths (26.43) pounds of resin per hour;

(B) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #320, with a maximum throughput rate of twenty-six and forty-three hundredths (26.43) pounds of resin per hour;

(C) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #520, with a maximum throughput rate of three hundred seventeen and eighteen hundredths (317.18) pounds of resin per hour;

(D) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #521, with a maximum throughput rate of three hundred ten and fifty-seven hundredths (310.57) pounds of resin per hour;

(E) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #522, with a maximum throughput rate of two hundred twenty-two and three hundredths (222.03) pounds of resin per hour;

(F) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #525, with a maximum throughput rate of one hundred forty-five and thirty-seven hundredths (145.37) pounds of resin per hour;

(G) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #526, with a maximum throughput rate of one hundred fifty-eight and fifty-nine hundredths (158.59) pounds of resin per hour;

(H) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #527, with a maximum throughput rate of sixty-two and seventy-eight hundredths (62.78) pounds of resin per hour;

(I) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #528, with a maximum throughput rate of sixty and seventy-nine hundredths (60.79) pounds of resin per hour; and

(J) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #529, with a maximum throughput rate of sixty-five and forty-two hundredths (65.42) pounds of resin per hour.

(b) Plastic granulation operations (aka scrap re-grind operations), consisting of eight (8) grinding machines to resize scrap for reuse in the injection molding operations, installed prior to 1964, with a maximum throughput rate of four hundred seventy-nine (479) pounds of resin scrap per hour, combined, controlled by an integral scrap reclamation system, consisting of eight (8) bag filters and one (1) cyclone, used to recover the resized scrap (plastic pellets) from the regrind operation for transport back to the injection molding operations, and exhausting to the inside of the building.

(c) One (1) fully enclosed pneumatic conveyance system for the transport and handling of plastic resin. The plastic resin is received by the facility via railcar, pneumatically conveyed to one of fourteen (14) fully enclosed plastic storage silos. The resin is then pneumatically conveyed to the injection-molding operations, directly to the injection-molding machines or to a nearby temporary storage bin until needed. Additionally, any scrap materials are collected and pneumatically conveyed to the scrap regrind area where the scrap is resized, collected, and sent back to the injection-molding operations for reuse.

(d) Cleanup solvent usage, consisting of wipe and aerosol spray application methods, to clean the molds in the Injection Molding Operations between uses, with a combined maximum solvent usage rate of two hundred eighteen and forty hundredths (218.40) gallons per year, uncontrolled and exhausting to the inside of the building.

(e) Seventy-five (75) natural gas-fired comfort space heaters, uncontrolled and exhausting to the inside of the building, and including:

(1) One (1) natural gas-fired comfort space heater(s), installed in 1982, with a maximum heat input capacity of two and seven hundred eighty-one thousandths (2.781) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(2) One (1) natural gas-fired comfort space heater(s), installed in 1984, with a maximum heat input capacity of one and eight hundred seventy-five thousandths (1.875) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(3) Seven (7) natural gas-fired comfort space heater(s), installed in 1992, with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(4) Two (2) natural gas-fired comfort space heater(s), installed in 1993, with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(5) One (1) natural gas-fired comfort space heater(s), installed in 1995, with a maximum heat input capacity of one hundred seventy-five thousandths (0.175) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(6) Nine (9) natural gas-fired comfort space heater(s), installed in 1997, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred forty thousandths (0.140) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(B) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred fifty thousandths (0.150) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building; and

(C) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, uncontrolled and exhausting to the inside of the building.

(D) Five (5) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(7) Three (3) natural gas-fired comfort space heater(s), installed in 1999, with a maximum heat input capacity of two hundred seventy-five thousandths (0.275) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(8) Nine (9) natural gas-fired comfort space heater(s), installed in 2000, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred twenty thousandths (0.120) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(B) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred fifty thousandths (0.150) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(C) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred seventy-five thousandths (0.175) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(D) Four (4) natural gas-fired comfort space heater(s), with a maximum heat input capacity of seven hundred thousandths (0.700) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building.

(9) Two (2) natural gas-fired comfort space heater(s), installed in 2001, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred forty thousandths (0.140) million British thermal units per hour, uncontrolled and exhausting to the inside of the building; and

(B) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, uncontrolled and exhausting to the inside of the building.

(10) Four (4) natural gas-fired comfort space heater(s), installed in 2002, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred twenty thousandths (0.120) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(B) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred fifty thousandths (0.150) million British thermal units per hour, uncontrolled and exhausting to the inside of the building; and

(C) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building.

(11) Seven (7) natural gas-fired comfort space heater(s), installed in 2003, and including the following:

(A) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(B) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of three hundred twenty thousandths (0.320) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building; and

(C) Three (3) natural gas-fired comfort space heater(s), with a maximum heat input capacity of three and two hundred eighty-seven thousandths (3.287) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building.

(12) Four (4) natural gas-fired comfort space heater(s), installed in 2004, and including the following:

(A) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(B) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two and two hundred thousandths (2.200) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(13) Twenty-one (21) natural gas-fired comfort space heater(s), installed in 2006, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two hundred thousandths (0.200) million British thermal units per hour, uncontrolled and exhausting to the inside of the building, and including:

(B) Eight (8) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(C) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred seventy-five thousandths (0.175) million British thermal units per hour, uncontrolled and exhausting to the inside of the building, and including:

(D) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of three hundred thousandths (0.300) million British thermal units per hour, uncontrolled and exhausting to the inside of the building, and including:

(E) Ten (10) natural gas-fired comfort space heater(s), with a maximum heat input capacity of four hundred thousandths (0.400) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(14) Four (4) natural gas-fired comfort space heater(s), installed in 2008, with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(f) A laboratory as defined in (326 IAC 2-1.1-3(e)(3)).

(g) Activities related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities are not associated with any commercial production process, including the following:

(1) Activities associated with the repair and maintenance of paved and unpaved roads, including paving or sealing, or both, of parking lots and roadways.

(2) Painting, including interior and exterior painting of buildings, and solvent use excluding degreasing operations utilizing halogenated organic solvents.

(3) Brazing, soldering, or welding operations and associated equipment.

(4) Portable blast-cleaning equipment with enclosures.

(5) Blast-cleaning equipment using water as the suspension agent and associated equipment.

(6) Batteries and battery charging stations, except at battery manufacturing plants.

(7) Lubrication, including:

(A) Hand-held spray can lubrication;

(B) Dipping metal parts into lubricating oil; or

(C) Manual or automated addition of cutting oil in machining operations.

(8) Non-asbestos insulation installation or removal.

(9) Tarring, retarring, and repair of building roofs.

(10) Bead blasting of heater tubes.

(11) Instrument air dryer and filter maintenance.

(12) Manual tank gauging.

(13) Open tumblers associated with deburring operations in maintenance shops.

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. 005-28577-00102 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 and Enforcement 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)]:

(b) Plastic granulation operations (aka scrap re-grind operations), consisting of eight (8) grinding machines to resize scrap for reuse in the injection molding operations, installed prior to 1964, with a maximum throughput rate of four hundred seventy-nine (479) pounds of resin scrap per hour, combined, controlled by an integral scrap reclamation system, consisting of eight (8) bag filters and one (1) cyclone, used to recover the resized scrap (plastic pellets) from the regrind operation for transport back to the injection molding operations, and exhausting to the inside of the building.

(c) One (1) fully enclosed pneumatic conveyance system for the transport and handling of plastic resin. The plastic resin is received by the facility via railcar, pneumatically conveyed to one of fourteen (14) fully enclosed plastic storage silos. The resin is then pneumatically conveyed to the injection-molding operations, directly to the injection-molding machines or to a nearby temporary storage bin until needed. Additionally, any scrap materials are collected and pneumatically conveyed to the scrap regrind area where the scrap is resized, collected, and sent back to the injection-molding operations for reuse.

(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 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any corresponding control device(s).

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.2 Particulate Control

(a) In order to comply with Condition D.1.1, the integral scrap reclamation system, consisting of eight (8) bag filters and one (1) cyclone, providing particulate control for the plastic granulation operations shall be in operation and control emissions from the plastic granulation operations at all times that any of the eight (8) plastic regrind machines, comprising the plastic granulation operation, are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Broken or Failed Bag Detection

(a) For a single compartment bag house controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).

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

D.1.4 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT 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:	Dorel Juvenile Group, Inc.
Address:	2525 State Street
City:	Columbus, IN 47201
Phone Number:	812-314-4277
Registration No.:	005-28577-00102

I hereby certify that Dorel Juvenile Group, Inc. is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Dorel Juvenile Group, Inc. is :
- ☐ in compliance with the requirements of Registration No. 005-28577-00102.
- ☐ not in compliance with the requirements of Registration No. 005-28577-00102.

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 Registration

Source Description and Location

Source Name:	**Dorel Juvenile Group, Inc.**
Source Location:	**2525 State St., Columbus, IN 47201**
County:	**Bartholomew**
SIC Code:	**3089**
Registration (or Exemption) No.:	**005-28577-00102**
Permit Reviewer:	**Hannah L. Desrosiers**

On October 15, 2009, the Office of Air Quality (OAQ) received an application from Dorel Juvenile Group, Inc. related to the operation of an existing injection-molding source.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

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

Pollutant	Designation
PM_{10}	Unclassifiable effective November 15, 1990.
PM2.5	Unclassifiable or attainment effective April 5, 2005
SO_2	Better than national standards.
NO_2	Cannot be classified or 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]
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 (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. Bartholomew 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
Bartholomew County has been classified as attainment or unclassifiable for PM2.5. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 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 PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Bartholomew County has been classified as attainment or unclassifiable in Indiana for all 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 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Dorel Juvenile Group, Inc. on October 15, 2009, relating to the operation of an existing injection-molding source.

The following is a list of the unpermitted emission unit*(s)*:

(a) Ninety-six (96) injection molding machines, uncontrolled and exhausting to the inside of the building, and including:

(1) Eight (8) Injection Molding Machines, installed prior to 1964, and including the following:

(A) One (1) HPM Injection Molding Machine, identified as Dorel Machine #217, with a maximum throughput rate of one hundred twenty-six and fifteen hundredths (126.15) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #218, with a maximum throughput rate of one hundred forty-six and thirty-nine hundredths (146.39) pounds of resin per hour;

(C) Four (4) Van Dorn Injection Molding Machine, identified as Dorel Machine #s 301, 302, 304 and 306, with a maximum throughput rate of twenty-two and sixty-six hundredths (22.66) pounds of resin per hour, each;

(D) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #305, with a maximum throughput rate of nineteen and eighty-two hundredths (19.82) pounds of resin per hour; and

(E) One (1) Natco Injection Molding Machine, identified as Dorel Machine #311, with a maximum throughput rate of forty-six and twenty-six hundredths (46.26) pounds of resin per hour.

(2) One (1) Natco Injection Molding Machines, identified as Dorel Machine #509, installed in 1964, with a maximum throughput rate of two hundred thirteen and forty-nine hundredths (213.49) pounds of resin per hour;

(3) One (1) Natco Injection Molding Machines, identified as Dorel Machine #507, installed in 1966, with a maximum throughput rate of one hundred fifty-two and forty-nine hundredths (152.49) pounds of resin per hour;

(4) Three (3) Injection Molding Machines, installed in 1967, and including the following:

(A) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #303, with a maximum throughput rate of twenty-six and forty-three hundredths (26.43) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #506, with a maximum throughput rate of one hundred forty-six and thirty-nine hundredths (146.39) pounds of resin per hour; and

(C) One (1) Natco Injection Molding Machine, identified as Dorel Machine #508, with a maximum throughput rate of two hundred twenty-eight and seventy-four hundredths (228.74) pounds of resin per hour.

(5) Three (3) Injection Molding Machines, installed in 1969, and including the following:

(A) One (1) Natco Injection Molding Machine, identified as Dorel Machine #203, with a maximum throughput rate of one hundred ninety-one and sixty-three hundredths (191.63) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #204, with a maximum throughput rate of two hundred thirty-four and fifty-eight hundredths (234.58) pounds of resin per hour; and

(C) One (1) Natco Injection Molding Machine, identified as Dorel Machine #219, with a maximum throughput rate of ninety-eight and eighty-one hundredths (98.81) pounds of resin per hour.

(6) Two (2) Injection Molding Machines, installed in 1979, and including the following:

(A) One (1) Cincinnati Injection Molding Machine, identified as Dorel Machine #220, with a maximum throughput rate of two hundred eighteen and six hundredths (218.06) pounds of resin per hour; and

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #310, with a maximum throughput rate of forty-six and twenty-six hundredths (46.26) pounds of resin per hour.

(7) One (1) Natco Injection Molding Machine, identified as Dorel Machine #207, installed in 1982, with a maximum throughput rate of ninety-four and fifty-four hundredths (94.54) pounds of resin per hour;

(8) One (1) Natco Injection Molding Machine, identified as Dorel Machine #212, installed in 1983, with a maximum throughput rate of three hundred thirty-eight and eighty-one hundredths (338.81) pounds of resin per hour;

(9) One (1) Natco Injection Molding Machine, identified as Dorel Machine #213, installed in 1988, with a maximum throughput rate of two hundred eighty-six and sixty-eight hundredths (286.68) pounds of resin per hour;

(10) Two (2) Injection Molding Machines, installed in 1992, and including the following:

(A) One (1) HPM Injection Molding Machine, identified as Dorel Machine #201, with a maximum throughput rate of sixty and seventy-nine hundredths (60.79) pounds of resin per hour; and

(B) One (1) HPM Injection Molding Machine, identified as Dorel Machine #202, with a maximum throughput rate of one hundred thirty-one and twenty-eight hundredths (131.28) pounds of resin per hour.

(11) Three (3) Injection Molding Machines, installed in 1993, and including the following:

(A) One (1) HPM Injection Molding Machine, identified as Dorel Machine #133, with a maximum throughput rate of two hundred forty-four and forty-four hundredths (244.44) pounds of resin per hour;

(B) One (1) HPM Injection Molding Machine, identified as Dorel Machine #206, with a maximum throughput rate of ninety-nine and twelve hundredths (99.12) pounds of resin per hour; and

(C) One (1) HPM Injection Molding Machine, identified as Dorel Machine #209, with a maximum throughput rate of eighty-five and ninety hundredths (85.90) pounds of resin per hour.

(12) One (1) HPM Injection Molding Machines, identified as Dorel Machine #132, installed in 1994, with a maximum throughput rate of two hundred fifty-five and thirty-three hundredths (255.33) pounds of resin per hour;

(13) Four (4) Injection Molding Machines, installed in 1997, and including the following:

(A) One (1) Natco Injection Molding Machine, identified as Dorel Machine #205, with a maximum throughput rate of two hundred nineteen and fifty-nine hundredths (219.59) pounds of resin per hour;

(B) One (1) HPM Injection Molding Machine, identified as Dorel Machine #312, with a maximum throughput rate of thirty- one and seventy-two hundredths (31.72) pounds of resin per hour;

(C) One (1) HPM Injection Molding Machine, identified as Dorel Machine #323, with a maximum throughput rate of seventy-nine and thirty hundredths (79.30) pounds of resin per hour;

(D) One (1) HPM Injection Molding Machine, identified as Dorel Machine #324, with a maximum throughput rate of seventy-five and thirty-three hundredths (75.33) pounds of resin per hour;

(14) Five (5) Injection Molding Machines, installed in 1998, and including the following:

(A) One (1) Natco Injection Molding Machine, identified as Dorel Machine #135, with a maximum throughput rate of two hundred seventy-six and five hundredths (276.05) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #136, with a maximum throughput rate of two hundred forty-four and eighty-two hundredths (244.82) pounds of resin per hour;

(C) One (1) Natco Injection Molding Machine, identified as Dorel Machine #208, with a maximum throughput rate of seventy-nine and thirty hundredths (79.30) pounds of resin per hour;

(D) One (1) HPM Injection Molding Machine, identified as Dorel Machine #211, with a maximum throughput rate of eighty-two and ninety hundredths (82.90) pounds of resin per hour;

(E) One (1) Natco Injection Molding Machine, identified as Dorel Machine #214, with a maximum throughput rate of ninety-seven and fifty-nine hundredths (97.59) pounds of resin per hour;

(15) Two (2) Injection Molding Machines, installed in 1999, and including the following:

(A) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #307, with a maximum throughput rate of twenty-two and sixty-six hundredths (22.66) pounds of resin per hour;

(B) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #321, with a maximum throughput rate of thirty-three and eighty-nine hundredths (34.89) pounds of resin per hour;

(16) Three (3) Injection Molding Machines, installed in 2000, and including the following:

(A) One (1) Natco Injection Molding Machine, identified as Dorel Machine #102, with a maximum throughput rate of two hundred forty-seven and fifty hundredths (247.50) pounds of resin per hour;

(B) One (1) Natco Injection Molding Machine, identified as Dorel Machine #130, with a maximum throughput rate of two hundred fifty-two and seventy-five hundredths (252.75) pounds of resin per hour;

(C) One (1) Natco Injection Molding Machine, identified as Dorel Machine #131, with a maximum throughput rate of two hundred fifty-seven and seventy-one hundredths (257.71) pounds of resin per hour;

(17) Three (3) Injection Molding Machines, installed in 2001, and including the following:

(A) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #322, with a maximum throughput rate of thirty-four and eighty-nine hundredths (34.89) pounds of resin per hour;

(B) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #403, with a maximum throughput rate of seventy-one and eighty hundredths (71.80) pounds of resin per hour;

(C) One (1) Van Dorn Injection Molding Machine, identified as Dorel Machine #404, with a maximum throughput rate of seventy-five and thirty-three hundredths (75.33) pounds of resin per hour;

(18) Forty-one (41) Injection Molding Machines, installed in 2003, and including the following:

(A) One (1) Mitsubishi Injection Molding Machine, identified as Dorel Machine #103, with a maximum throughput rate of three hundred and ten fifty-seven hundredths (310.57) pounds of resin per hour;

(B) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #104, with a maximum throughput rate of one hundred sixty-five and twenty hundredths (165.20) pounds of resin per hour;

(C) Four (4) Mitsubishi Injection Molding Machines, identified as Dorel Machine #s 105, 106, 108, and 109, with a maximum throughput rate of two hundred sixty-six and twenty-one hundredths (266.21) pounds of resin per hour, each;

(D) Five (5) Milacron Injection Molding Machines, identified as Dorel Machine #s 107, 110, 112, 114, and 115, with a maximum throughput rate of three hundred seventeen and eighteen hundredths (317.18) pounds of resin per hour, each;

(E) Two (2) Milacron Injection Molding Machines, identified as Dorel Machine #s 111 and 116, with a maximum throughput rate of two hundred ninety-two and seventy-eight hundredths (292.78) pounds of resin per hour, each;

(F) One (1) Mitsubishi Injection Molding Machine, identified as Dorel Machine #210, with a maximum throughput rate of one hundred one and thirty-two hundredths (101.32) pounds of resin per hour;

(G) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #308, with a maximum throughput rate of fifteen and eighty-six (15.86) pounds of resin per hour;

(H) One (1) Toshiba Injection Molding Machine, identified as Dorel Machine #313, with a maximum throughput rate of fifty-nine and forty-seven hundredths (59.47) pounds of resin per hour;

(I) One (1) Toshiba Injection Molding Machine, identified as Dorel Machine #314, with a maximum throughput rate of fifty-five and fifty-one hundredths (55.51) pounds of resin per hour;

(J) One (1) Toshiba Injection Molding Machine, identified as Dorel Machine #315, with a maximum throughput rate of forty-three and sixty-one hundredths (43.61) pounds of resin per hour;

(K) Three (3) Milacron Injection Molding Machines, identified as Dorel Machine #400, 401, and 402, with a maximum throughput rate of one hundred seven and eighty-four hundredths (107.84) pounds of resin per hour, each;

(L) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #408, with a maximum throughput rate of forty-nine and sixteen hundredths (49.16) pounds of resin per hour;

(M) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #409, with a maximum throughput rate of fifty-four and sixty-three hundredths (54.63) pounds of resin per hour;

(N) Three (3) Milacron Injection Molding Machines, identified as Dorel Machine #s 410, 411, 433, and with a maximum throughput rate of forty-four and sixty-nine hundredths (44.69) pounds of resin per hour, each;

(O) Two (2) Mitsubishi Injection Molding Machines, identified as Dorel Machine #s 421 and 423, with a maximum throughput rate of ninety-one and ninety-eight (91.98) pounds of resin per hour, each;

(P) Two (2) Mitsubishi Injection Molding Machines, identified as Dorel Machine #s 422 and 424, with a maximum throughput rate of eighty-three and sixty-two hundredths (83.62) pounds of resin per hour, each;

(Q) One (1) Mitsubishi and One (1) Milacron Injection Molding Machine, identified as Dorel Machine #425 and 503, with a maximum throughput rate of one hundred three and eighty-eight (103.88) pounds of resin per hour, each;

(R) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #429, with a maximum throughput rate of eighty-two and forty-seven hundredths (82.47) pounds of resin per hour;

(S) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #430, with a maximum throughput rate of one hundred fifty-eight and fifty-nine hundredths (158.59) pounds of resin per hour;

(T) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #431, with a maximum throughput rate of one hundred sixty-six and fifty-two hundredths (166.52) pounds of resin per hour;

(U) Two (2) Milacron Injection Molding Machines, identified as Dorel Machine #s 432 and 504, with a maximum throughput rate of one hundred seven and five hundredths (107.05) pounds of resin per hour, each;

(V) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #501, with a maximum throughput rate of two hundred fifty-nine and fifty-one hundredths (259.51) pounds of resin per hour;

(W) Two (2) Milacron Injection Molding Machines, identified as Dorel Machine #s 502 and 523, with a maximum throughput rate of eighty-nine and twenty-one hundredths (89.21) pounds of resin per hour, each;

(X) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #505, with a maximum throughput rate of ninety-nine and twelve hundredths (99.12) pounds of resin per hour; and

(Y) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #524, with a maximum throughput rate of two hundred sixty three and twelve hundredths (263.12) pounds of resin per hour.

(19) Ten (10) Injection Molding Machines, installed in 2004, and including the following:

(A) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #319, with a maximum throughput rate of twenty-six and forty-three hundredths (26.43) pounds of resin per hour;

(B) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #320, with a maximum throughput rate of twenty-six and forty-three hundredths (26.43) pounds of resin per hour;

(C) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #520, with a maximum throughput rate of three hundred seventeen and eighteen hundredths (317.18) pounds of resin per hour;

(D) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #521, with a maximum throughput rate of three hundred ten and fifty-seven hundredths (310.57) pounds of resin per hour;

(E) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #522, with a maximum throughput rate of two hundred twenty-two and three hundredths (222.03) pounds of resin per hour;

(F) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #525, with a maximum throughput rate of one hundred forty-five and thirty-seven hundredths (145.37) pounds of resin per hour;

(G) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #526, with a maximum throughput rate of one hundred fifty-eight and fifty-nine hundredths (158.59) pounds of resin per hour;

(H) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #527, with a maximum throughput rate of sixty-two and seventy-eight hundredths (62.78) pounds of resin per hour;

(I) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #528, with a maximum throughput rate of sixty and seventy-nine hundredths (60.79) pounds of resin per hour; and

(J) One (1) Milacron Injection Molding Machine, identified as Dorel Machine #529, with a maximum throughput rate of sixty-five and forty-two hundredths (65.42) pounds of resin per hour.

(b) Plastic granulation operations (aka scrap re-grind operations), consisting of eight (8) grinding machines to resize scrap for reuse in the injection molding operations, installed prior to 1964, with a maximum throughput rate of four hundred seventy-nine (479) pounds of resin scrap per hour, combined, controlled by an integral scrap reclamation system, consisting of eight (8) bag filters and one (1) cyclone, used to recover the resized scrap (plastic pellets) from the regrind operation for transport back to the injection molding operations, and exhausting to the inside of the building.

(c) One (1) fully enclosed pneumatic conveyance system for the transport and handling of plastic resin. The plastic resin is received by the facility via railcar, pneumatically conveyed to one (1) of fourteen (14) fully enclosed plastic storage silos. The resin is then pneumatically conveyed to the injection-molding operations, directly to the injection-molding machines or to a nearby temporary storage bin until needed. Additionally, any scrap materials are collected and pneumatically conveyed to the scrap regrind area where the scrap is resized, collected, and sent back to the injection-molding operations for reuse.

(d) Cleanup solvent usage, consisting of wipe and aerosol spray application methods, to clean the molds in the Injection Molding Operations between uses, with a combined maximum solvent usage rate of two hundred eighteen and forty hundredths (218.40) gallons per year, uncontrolled and exhausting to the inside of the building.

(e) Seventy-five (75) natural gas-fired comfort space heaters, uncontrolled and exhausting to the inside of the building, and including:

(1) One (1) natural gas-fired comfort space heater(s), installed in 1982, with a maximum heat input capacity of two and seven hundred eighty-one thousandths (2.781) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(2) One (1) natural gas-fired comfort space heater(s), installed in 1984, with a maximum heat input capacity of one and eight hundred seventy-five thousandths (1.875) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(3) Seven (7) natural gas-fired comfort space heater(s), installed in 1992, with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(4) Two (2) natural gas-fired comfort space heater(s), installed in 1993, with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(5) One (1) natural gas-fired comfort space heater(s), installed in 1995, with a maximum heat input capacity of one hundred seventy-five thousandths (0.175) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(6) Nine (9) natural gas-fired comfort space heater(s), installed in 1997, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred forty thousandths (0.140) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(B) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred fifty thousandths (0.150) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building; and

(C) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, uncontrolled and exhausting to the inside of the building.

(D) Five (5) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(7) Three (3) natural gas-fired comfort space heater(s), installed in 1999, with a maximum heat input capacity of two hundred seventy-five thousandths (0.275) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(8) Nine (9) natural gas-fired comfort space heater(s), installed in 2000, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred twenty thousandths (0.120) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(B) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred fifty thousandths (0.150) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(C) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred seventy-five thousandths (0.175) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(D) Four (4) natural gas-fired comfort space heater(s), with a maximum heat input capacity of seven hundred thousandths (0.700) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building.

(9) Two (2) natural gas-fired comfort space heater(s), installed in 2001, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred forty thousandths (0.140) million British thermal units per hour, uncontrolled and exhausting to the inside of the building; and

(B) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, uncontrolled and exhausting to the inside of the building.

(10) Four (4) natural gas-fired comfort space heater(s), installed in 2002, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred twenty thousandths (0.120) million British thermal units per hour, uncontrolled and exhausting to the inside of the building;

(B) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred fifty thousandths (0.150) million British thermal units per hour, uncontrolled and exhausting to the inside of the building; and

(C) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two hundred seventy thousandths (0.270) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building.

(11) Seven (7) natural gas-fired comfort space heater(s), installed in 2003, and including the following:

(A) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building;

(B) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of three hundred twenty thousandths (0.320) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building; and

(C) Three (3) natural gas-fired comfort space heater(s), with a maximum heat input capacity of three and two hundred eighty-seven thousandths (3.287) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building.

(12) Four (4) natural gas-fired comfort space heater(s), installed in 2004, and including the following:

(A) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(B) Two (2) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two and two hundred thousandths (2.200) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(13) Twenty-one (21) natural gas-fired comfort space heater(s), installed in 2006, and including the following:

(A) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of two hundred thousandths (0.200) million British thermal units per hour, uncontrolled and exhausting to the inside of the building, and including:

(B) Eight (8) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(C) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of one hundred seventy-five thousandths (0.175) million British thermal units per hour, uncontrolled and exhausting to the inside of the building, and including:

(D) One (1) natural gas-fired comfort space heater(s), with a maximum heat input capacity of three hundred thousandths (0.300) million British thermal units per hour, uncontrolled and exhausting to the inside of the building, and including:

(E) Ten (10) natural gas-fired comfort space heater(s), with a maximum heat input capacity of four hundred thousandths (0.400) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(14) Four (4) natural gas-fired comfort space heater(s), installed in 2008, with a maximum heat input capacity of one hundred sixty thousandths (0.160) million British thermal units per hour, each, uncontrolled and exhausting to the inside of the building, and including:

(f) A laboratory as defined in (326 IAC 2-1.1-3(e)(3)).

(g) Activities related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities are not associated with any commercial production process, including the following:

(1) Activities associated with the repair and maintenance of paved and unpaved roads, including paving or sealing, or both, of parking lots and roadways.

(2) Painting, including interior and exterior painting of buildings, and solvent use excluding degreasing operations utilizing halogenated organic solvents.

(3) Brazing, soldering, or welding operations and associated equipment.

(4) Portable blast-cleaning equipment with enclosures.

(5) Blast-cleaning equipment using water as the suspension agent and associated equipment.

(6) Batteries and battery charging stations, except at battery manufacturing plants.

(7) Lubrication, including:

(A) Hand-held spray can lubrication;

(B) Dipping metal parts into lubricating oil; or

(C) Manual or automated addition of cutting oil in machining operations.

(8) Non-asbestos insulation installation or removal.

(9) Tarring, retarring, and repair of building roofs.

(10) Bead blasting of heater tubes.

(11) Instrument air dryer and filter maintenance.

(12) Manual tank gauging.

(13) Open tumblers associated with deburring operations in maintenance shops.

"Integral Part of the Process" Determination

(a) With this application, the Permittee has submitted the following information to justify why the clean plastics scrap reclamation system, consisting of eight (8) bag filters and one (1) cyclone, should be considered an integral part of the plastic granulation and injection molding operations.

(1) <u>The control equipment serves a primary purpose other than pollution control.</u>
The primary purpose of the clean plastics scrap reclamation system is not to control air pollution. The reclamation system is used to collect resized scrap material from the plastic granulation operations. This material is captured by the eight (8) bag filters, passes through the cyclone, and is sent back into the pneumatic conveyance system to the injection molding

operations. This equipment would have been installed even if the air quality regulation were not in place, because it is used to recycle scrap material from the injection molding operations.

(2) The control equipment has an overwhelming positive net economic effect.
It is estimated that over 157,000 pounds of material is collected for reuse. The economic benefit of this is as follows:

Equipment Cost		
Annualized Equipment Cost for Reclamation System - with a purchase cost of $40,000, spread over five years, including install and ops	$ 8,650	per year
Operation and Maintenance Costs - $1,000 per unit	$ 9,000	per year
Subtotal	**$ 17,650**	per year
Product Savings		
Plastics Usage Rate for 2008	45,000,000	pounds
Facility Wide Scrap	3.5	%
Percent of scrap recovered from regrind process	99.79	%
Amount of plastic recovered	1,571,693	pounds per year
Cost of virgin polypropylene	$ 0.496	per pound
Savings from use of recovered material	**$ 779,559**	dollars per year
Total Economic Impact		
Product Savings minus Equipment & Operational Costs	**$ 761,909**	**dollars per year**

IDEM, OAQ has evaluated the information submitted and agrees that the clean plastics scrap reclamation system, consisting of eight (8) bag filters and one (1) cyclone, should be considered an integral part of the plastic granulation operations. This determination is based on the fact that the clean resized plastic scrap collected by the system is sent back into the pneumatic conveyance system to the injection molding operations, where it is mixed with virgin plastic pellets and reused, resulting in the overwhelming positive net economic cost savings of $761,909 per year to the permittee. Therefore, the permitting level will be determined using the potential to emit after the scrap reclamation system. Operating conditions in the proposed permit will specify that the clean plastics scrap reclamation system, consisting of eight (8) bag filters and one (1) cyclone, shall operate at all times when any of the eight (8) plastic regrind machines, in the plastic granulation operation, are in operation.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

(a) For the purpose of this review, the PM/PM10/PM2.5 emissions from the pneumatic conveying system have been assumed negligible. This assumption has been made for the following reasons:

(1) Plastic resin is a non-friable material and the potential to emit particulate matter is insignificant;

(2) The system is fully enclosed and pneumatically driven by a blower, from receipt via silo loading to delivery to the injection molding machines; and

(3) Pursuant to 326 IAC 2-1.1-3(e)(18)(D), new sources or modifications of existing sources that consist of only conveyors, including enclosed systems for conveying plastic raw material and plastic finished goods, are considered exempt.

(b) No AP-42 emission factors exist for the machining of thermoplastics. Therefore, the EPA Webfire emission factor for Fiberglass Resin Products - Plastics Machining: Drilling/Sanding/ Sawing/etc. (SCC 30800701) has been used to characterize emissions from the plastic granulation operations.

(c) The clean plastics scrap reclamation system, consisting of eight (8) bag filters and one (1) cyclone, have been determined an integral part of the plastic granulation operations. Therefore, the potential to emit will be considered after the effect of the control device. See the “Integral Part of the Process” Determination Section above.

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*	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Injection Molding	2.13	2.13	2.13	-	-	5.00	-	0.24	0.16 (styrene)
Scrap Regrind	0.13	0.13	0.13	-	-	-	-	-	-
Pneumatic Material Conveyance [α]	negl.	negl.	negl.	-	-	-	-	-	-
Clean-up Solvent Usage	0	0	0	-	-	1.32	-	1.32	1.31 (trichloroethylene)
Natural Gas Combustion	0.13	1.23	0.92	0.10	16.19	0.89	13.60	0.31	0.29 (hexane)
Fugitive Emissions (Paved Roads)	1.00	0.19	0.02	-	-	-	-	-	-
Total PTE of Entire Source	**2.56**	**3.49**	**3.18**	**0.10**	**16.19**	**7.21**	**13.60**	**1.86**	**1.31 (trichloroethylene)**
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

[α] PM/PM10/PM2.5 emissions from the pneumatic conveyance of plastics materials throughout the facility are assumed to be negligible. See the "Emission Calculations" section of the TSD for further explanation.

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of *(pollutant(s))* are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Polyvinyl Chloride and Copolymers Production, 40 CFR 63, Subpart J (326 IAC 20-69), are not included in the permit, since this source is not a major source of HAPs, and does not meet the definition of a polyvinyl chloride (PVC) plant, as defined in 40 CFR 61.61(c).

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, since the source does not use any cold solvent cleaning machine, as defined in 40 CFR 63.461.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins, 40 CFR 63, Subpart U (326 IAC 20-19), are not included in the permit, since this source is not a major source of HAPs, and does not manufacture an elastomer product, as defined in §63.482.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Epoxy Resins Production and Non-Nylon Polyamides Production, 40 CFR 63, Subpart W (326 IAC 20-20), are not included in the permit, since this source is not a major source of HAPs, and does not manufacture basic liquid epoxy resins (BLR) and/or wet strength resins (WSR), as defined in §63.522.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production, 40 CFR 63, Subpart III (326 IAC 20-22), are not included in the permit, since this source is not a major source of HAPs, and does not produce flexible polyurethane or rebond foam, as defined in §63.1292.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Group IV Polymers and Resins, 40 CFR 63, Subpart JJJ (326 IAC 20-21), are not included in the permit, since this source is not a major source of HAPs, and does not manufacture thermoplastic products, as defined in §63.1312.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Manufacture of Amino/Phenolic Resins, 40 CFR 63, Subpart OOO (326 IAC 20-58), are not included in the permit, since this source is not a major source of HAPs, and does not produce amino/phenolic resins, as defined in §63.1402.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Polyether Polyols Production, 40 CFR 63, Subpart PPP (326 IAC 20-59), are not included in the

permit, since this source is not a major source of HAPs, and does not manufacture polyether polyols, as defined in §63.1423.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW (4W)(326 IAC 20-25), are not included in the permit, since this source is not a major source of HAPs, and does not produce reinforced plastic composites, as defined in §63.5935.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Flexible Polyurethane Foam Fabrication Operations, 40 CFR 63, Subpart MMMMM (5M) (326 IAC 20-66), are not included in the permit, since this source is not a major source of HAPs, and does not fabricate flexible polyurethane foam, as defined in §63.1292.

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Polyvinyl Chloride and Copolymers Production Area Sources, 40 CFR 63, Subpart DDDDDD (6D) (326 IAC 20), are not included in the permit, since this source does not produce polyvinyl chloride (PVC) or copolymers, as defined in §63.11144.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Acrylic and Modacrylic Fibers Production Area Sources, 40 CFR 63, Subpart LLLLLL (6L) (326 IAC 20), are not included in the permit, since this source does not produce acrylic or modacrylic fibers, as defined in §63.11398.

(m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR 63, Subpart OOOOOO (6O) (326 IAC 20), are not included in the permit, since this source does not produce flexible polyurethane foam or rebond foam as defined in §63.1292, and is not a flexible polyurethane foam fabrication facility, as defined in §63.11419.

(n) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

Entire Source

(a) 326 IAC 2-5.1-2 (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.

(g) 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.

(h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Injection Molding

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The potential particulate emissions from the injection molding process are less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the injection molding process is exempt from 326 IAC 6-3, and the requirements are not included in the permit.

Clean-up Solvent Usage

(a) 326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)
The cleanup solvent usage in the injection molding operation is not subject to the requirements of 326 IAC 8-1-6, since it does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

(b) There are no other 326 IAC 8 Rules that are applicable to the cleanup solvent usage.

Plastic Granulation Operations (aka the Scrap Regrind Operation)

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
During this review, IDEM has determined that the clean plastics scrap reclamation system, consisting of eight (8) bagfilters and one (1) cyclone, is an integral part of the plastic granulation operations. The

scrap reclamation system is used to pneumatically collect the clean resized plastics scrap from each of the eight (8) plastic regrind machines and send it back into the pneumatic conveyance system serving the injection molding operations, where it is then mixed with virgin plastic pellets and reused. Without the scrap reclamation system, the clean resized plastics scrap cannot be collected and transported for re-use in the injection molding operations. Thus, emissions from each of the scrap regrind machines shall be calculated after consideration of the scrap reclamation system.

The controlled particulate emissions from the scrap reclamation system are thirteen hundredths (0.13) tons per year, which is less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the plastic granulation operations are exempt from 326 IAC 6-3, and the requirements are not included in the permit

Since the clean plastics scrap reclamation system, consisting of eight (8) bagfilters and one (1) cyclone, has been determined an integral part of the plastic granulation operations, particulate from each of the eight (8) plastic regrind machines shall be controlled by the scrap reclamation system at all times that any of the eight (8) plastic regrind machines, comprising the plastic granulation operation, are in operation.

Pneumatic Material Conveyance

(a) <u>326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)</u>
The potential particulate emissions from the pneumatic conveyance of plastics materials throughout the facility are assumed negligible. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the injection molding process is exempt from 326 IAC 6-3, and the requirements are not included in the permit. See the "Emission Calculations" section of the TSD for further explanation.

Natural Gas Combustion

(a) <u>326 IAC 4-2-2 (Incinerators)</u>
The seventy-five (75) comfort space heaters are each not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 does not apply to any of the seventy-five (75) comfort space heaters, and the requirements are not included in the permit.

(b) <u>326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)</u>
The seventy-five (75) comfort space heaters, each, do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, 326 IAC 6-2 does not apply to any of the seventy-five (75) comfort space heaters, and the requirements are not included in the permit.

(c) <u>326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)</u>
The seventy-five (75) comfort space heaters, each, do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), therefore they are exempt from the requirements of 326 IAC 6-3, and the requirements are not included in the permit.

(d) <u>326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)</u>
The potential emissions from each of the seventy-five (75) comfort space heaters are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326 IAC 7-1.1-2 does not apply to any of the seventy-five (75) comfort space heaters, and the requirements are not included in the permit.

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 October 15, 2009.

The operation of this source shall be subject to the conditions of the attached proposed Registration No.: 005-28577-00102. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

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

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

Appendix A: Emissions Calculations
Entire Source Emission Summary

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

Uncontrolled Potential Emissions (tons/year)

		Emissions Generating Activity						
Category	Pollutant	Injection Molding (mult units)	Plastic Granulation Operations	Pneumatic Material Conveyance [α]	Clean-up Solvent Usage	Natural Gas Combustion (mult units)	Paved Roads	**TOTAL**
Criteria Pollutants	PM	2.13	0.41	0.00	0	0.31	1.00	2.84
	PM10	2.13	0.41	0.00	0	1.23	0.19	3.77
	PM2.5	2.13	0.41	0.00	0	0.92	0.02	3.46
	SO2	0	0	0	0	0.10	0	0.10
	NOx	0	0	0	0	16.19	0	16.19
	VOC	5.00	0	0	1.32	0.89	0	7.21
	CO	0	0	0	0	13.60	0	13.60
Hazardous Air Pollutants	Acetaldehyde	0.01	0	0	0	0	0	0.01
	Acrolein	6.00E-04	0	0	0	0	0	6.00E-04
	Benzene	0	0	0	0	3.40E-04	0	3.40E-04
	Dichlorobenzene	0	0	0	0	1.94E-04	0	1.94E-04
	Formaldehyde	0.01	0	0	0	0.01	0	0.02
	Hexane	0	0	0	0	0.29	0	0.29
	Propionaldehyde	0.06	0	0	0	0	0	0.06
	Styrene	0.16	0	0	0	0	0	0.16
	Toluene	0	0	0	0	5.50E-04	0	5.50E-04
	Trichloroethylene	0	0	0	1.31	0	0	1.31
	Cadmium	0	0	0	0	1.78E-04	0	1.78E-04
	Chromium	0	0	0	0	1.78E-04	0	1.78E-04
	Lead	0	0	0	0	8.09E-05	0	8.09E-05
	Manganese	0	0	0	0	6.15E-05	0	6.15E-05
	Nickel	0	0	0	0	3.40E-04	0	3.40E-04
	Totals	**0.24**	**0**	**0**	**1.31**	**0.31**	**0**	**1.86**
						Worse Case HAP		**1.31**

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

[α] PM/PM10/PM2.5 emissions from the pneumatic conveyance of plastics materials throughout the facility are assumed negligible. See the "Emission Calculations" section of the TSD for further explanation.

Appendix A: Emissions Calculations
Potential to Emit Criteria Air Pollutants from the Injection Molding Machines
Processing Polypropylene with a 505 ^{o}F Melt Temperature

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

			PM			VOC		
Dorel Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	(1) Emission Factor (lbs/10^6 lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	(1) Emission Factor (lbs/10^6 lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
102	PP	247.50	34.5	0.01	0.04	80.3	0.02	0.09
103	PP	310.57	34.5	0.01	0.05	80.3	0.02	0.11
104	PP	165.20	34.5	0.01	0.02	80.3	0.01	0.06
105	PP	266.21	34.5	0.01	0.04	80.3	0.02	0.09
106	PP	266.21	34.5	0.01	0.04	80.3	0.02	0.09
107	PP	317.18	34.5	0.01	0.05	80.3	0.03	0.11
108	PP	266.21	34.5	0.01	0.04	80.3	0.02	0.09
109	PP	266.21	34.5	0.01	0.04	80.3	0.02	0.09
110	PP	317.18	34.5	0.01	0.05	80.3	0.03	0.11
111	PP	292.78	34.5	0.01	0.04	80.3	0.02	0.10
112	PP	317.18	34.5	0.01	0.05	80.3	0.03	0.11
114	PP	317.18	34.5	0.01	0.05	80.3	0.03	0.11
115	PP	317.18	34.5	0.01	0.05	80.3	0.03	0.11
116	PP	292.78	34.5	0.01	0.04	80.3	0.02	0.10
130	PP	252.75	34.5	0.01	0.04	80.3	0.02	0.09
131	PP	257.71	34.5	0.01	0.04	80.3	0.02	0.09
132	PP	255.33	34.5	0.01	0.04	80.3	0.02	0.09
133	PP	244.44	34.5	0.01	0.04	80.3	0.02	0.09
135	PP	276.05	34.5	0.01	0.04	80.3	0.02	0.10
136	PP	244.82	34.5	0.01	0.04	80.3	0.02	0.09
201	PP	60.79	34.5	0.00	0.01	80.3	0.00	0.02
202	PP	131.28	34.5	0.00	0.02	80.3	0.01	0.05
203	PP	191.63	34.5	0.01	0.03	80.3	0.02	0.07
204	PP	234.58	34.5	0.01	0.04	80.3	0.02	0.08
205	PP	219.59	34.5	0.01	0.03	80.3	0.02	0.08
206	PP	99.12	34.5	0.00	0.01	80.3	0.01	0.03
207	PP	94.54	34.5	0.00	0.01	80.3	0.01	0.03
208	PP	79.30	34.5	0.00	0.01	80.3	0.01	0.03
209	PP	85.90	34.5	0.00	0.01	80.3	0.01	0.03
210	PP	101.32	34.5	0.00	0.02	80.3	0.01	0.04
211	PP	82.90	34.5	0.00	0.01	80.3	0.01	0.03
212	PP	338.81	34.5	0.01	0.05	80.3	0.03	0.12
213	PP	286.68	34.5	0.01	0.04	80.3	0.02	0.10
214	PP	97.59	34.5	0.00	0.01	80.3	0.01	0.03
217	PP	126.15	34.5	0.00	0.02	80.3	0.01	0.04
218	PP	146.39	34.5	0.01	0.02	80.3	0.01	0.05
219	PP	98.81	34.5	0.00	0.01	80.3	0.01	0.03
220	PP	218.06	34.5	0.01	0.03	80.3	0.02	0.08
301	PP	22.66	34.5	0.00	0.00	80.3	0.00	0.01
302	PP	22.66	34.5	0.00	0.00	80.3	0.00	0.01
303	PP	26.43	34.5	0.00	0.00	80.3	0.00	0.01
304	PP	22.66	34.5	0.00	0.00	80.3	0.00	0.01
305	PP	19.82	34.5	0.00	0.00	80.3	0.00	0.01
306	PP	22.66	34.5	0.00	0.00	80.3	0.00	0.01
307	PP	22.66	34.5	0.00	0.00	80.3	0.00	0.01
308	(2) PP/PVC	15.86	34.5	0.00	0.00	80.3	0.00	0.01
310	PP	46.26	34.5	0.00	0.01	80.3	0.00	0.02
311	PP	46.26	34.5	0.00	0.01	80.3	0.00	0.02
312	PP	31.72	34.5	0.00	0.00	80.3	0.00	0.01
313	PP	59.47	34.5	0.00	0.01	80.3	0.00	0.02
314	PP	55.51	34.5	0.00	0.01	80.3	0.00	0.02
315	PP	43.61	34.5	0.00	0.01	80.3	0.00	0.02
319	PP	26.43	34.5	0.00	0.00	80.3	0.00	0.01
320	(3) PP/TPE	26.43	34.5	0.00	0.00	80.3	0.00	0.01
321	(3) PP/TPE	34.89	34.5	0.00	0.01	80.3	0.00	0.01
322	PP	34.89	34.5	0.00	0.01	80.3	0.00	0.01
323	PP	79.30	34.5	0.00	0.01	80.3	0.01	0.03
324	PP	75.33	34.5	0.00	0.01	80.3	0.01	0.03
400	PP	107.84	34.5	0.00	0.02	80.3	0.01	0.04
401	(4) PP/ABS	107.84	34.5	0.00	0.02	189	0.02	0.09
402	(4) PP/ABS	107.84	34.5	0.00	0.02	189	0.02	0.09
403	(4) PP/ABS	71.80	34.5	0.00	0.01	189	0.01	0.06
404	PP	75.33	34.5	0.00	0.01	80.3	0.01	0.03
408	PP	49.16	34.5	0.00	0.01	80.3	0.00	0.02
409	PP	54.63	34.5	0.00	0.01	80.3	0.00	0.02
410	PP	44.69	34.5	0.00	0.01	80.3	0.00	0.02
411	PP	44.69	34.5	0.00	0.01	80.3	0.00	0.02
433	PP	44.69	34.5	0.00	0.01	80.3	0.00	0.02
421	PP	91.98	34.5	0.00	0.01	80.3	0.01	0.03
422	PP	83.62	34.5	0.00	0.01	80.3	0.01	0.03
423	PP	91.98	34.5	0.00	0.01	80.3	0.01	0.03
424	PP	83.62	34.5	0.00	0.01	80.3	0.01	0.03

Appendix A: Emissions Calculations
Potential to Emit Criteria Air Pollutants from the Injection Molding Machines
Processing Polypropylene with a 505 ^{o} F Melt Temperature

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

			PM			VOC		
Dorel Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	[1] Emission Factor (lbs/10^6 lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	[1] Emission Factor (lbs/10^6 lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
425	[5] PP/Nylon	103.88	104	0.01	0.05	137	0.01	0.06
429	[5] PP/Nylon	82.47	104	0.01	0.04	137	0.01	0.05
430	PP	158.59	34.5	0.01	0.02	80.3	0.01	0.06
431	PP	166.52	34.5	0.01	0.03	80.3	0.01	0.06
432	PP	107.05	34.5	0.00	0.02	80.3	0.01	0.04
501	PP	259.51	34.5	0.01	0.04	80.3	0.02	0.09
524	PP	263.12	34.5	0.01	0.04	80.3	0.02	0.09
503	PP	103.08	34.5	0.00	0.02	80.3	0.01	0.04
504	PP	107.05	34.5	0.00	0.02	80.3	0.01	0.04
505	PP	99.12	34.5	0.00	0.01	80.3	0.01	0.03
506	PP	146.39	34.5	0.01	0.02	80.3	0.01	0.05
507	PP	152.49	34.5	0.01	0.02	80.3	0.01	0.05
508	PP	228.74	34.5	0.01	0.03	80.3	0.02	0.08
509	PP	213.49	34.5	0.01	0.03	80.3	0.02	0.08
520	PP	317.18	34.5	0.01	0.05	80.3	0.03	0.11
521	PP	310.57	34.5	0.01	0.05	80.3	0.02	0.11
522	PP	222.03	34.5	0.01	0.03	80.3	0.02	0.08
523	PP	89.21	34.5	0.00	0.01	80.3	0.01	0.03
502	PP	89.21	34.5	0.00	0.01	80.3	0.01	0.03
525	PP	145.37	34.5	0.01	0.02	80.3	0.01	0.05
526	PP	158.59	34.5	0.01	0.02	80.3	0.01	0.06
527	PP	62.78	34.5	0.00	0.01	80.3	0.01	0.02
528	PP	60.79	34.5	0.00	0.01	80.3	0.00	0.02
529	PP	65.42	34.5	0.00	0.01	80.3	0.01	0.02
	Totals	**13,691.95**		**0.49**	**2.13**		**1.14**	**5.00**

Methodology
Emissions (lbs/hr) = Max Throughput Rate (lbs resin/hr) * Emission Factor (lbs/10^6 lbs) /1000000
Emissions (tons/yr) = Emissions (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

Notes
These calculations were submitted by the source and verified to be accurate by IDEM.

[1] Emission factors for PM & VOC from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 ^{o} F and reactor impact copolymer was used as the emission factor. The worst case emission factor was used for all machines that process polypropylene along with other plastics.

[2] Polypropylene emission factors were the worst case emission factors for this machine and were used in lieu of the emission factors for PVC from the technical paper, "Process Emissions for the Vinyl Pipe Industry", from volume 2 of the Journal of Vinyl & Additive Technology.

[a] No emission factors from the Journal of Vinyl & Additive Technology were used. The emissions from PVC were reviewed and were determined to lower than the PP emission factors, therefore the PP emission factors were used.

[3] Polypropylene emission factors were the worst case emission factors for this machine and were used in lieu of the emission factors for TPE from the technical paper, "Development of Emission Factors for Polyethylene Processing" from volume 46 of the Journal of Air and Waste Management Association.

[4] The polypropylene emission factor for PM was this worst case emission factor for this machine. The emission factor for VOC emissions come from the technical paper, "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins", from volume 45 of the Journal of Air and Waste Management Association.

[5] Emission factors for PM & VOC from Nylon processing were the worst case emission factors and were used in lieu of the emission factors for polypropylene molding. The emission factors come from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51 of the Journal of Air and Waste Management Association. The source uses two types of nylon, PA-66 and EPDM Toughened PA-66, and the worst case emission factor for each nylon were used.

Appendix A: Emissions Calculations
Potential to Emit Hazardous Air Pollutants (HAPs) from the Injection Molding Machines

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

HAP Emission Factors from Processing Polypropylene

HAP Constituent	CAS #	(1) Emission Factor (lbs/10^6 lbs)
Acetaldehyde	75-07-0	0.2
Acrolein	107-02-8	0.01
Formaldehyde	50-00-0	0.18
Propionaldehyde	123-38-6	0.95

HAP Emission Factors from Processing Nylon

HAP Constituent	CAS #	(2) Emission Factor (lbs/10^6 lbs)
Styrene	100-42-5	0.32

HAP Emission Factors from Processing ABS

HAP Constituent	CAS #	(3) Emission Factor (lbs/10^6 lbs)
Styrene	100-42-5	130

Dorel Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	Acetaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/hr)	Formaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)	Styrene Emissions (tons/yr)
102	PP	247.50	2.17E-04	1.08E-05	1.95E-04	1.03E-03	NA
103	PP	310.57	2.72E-04	1.36E-05	2.45E-04	1.29E-03	NA
104	PP	165.20	1.45E-04	7.24E-06	1.30E-04	6.87E-04	NA
105	PP	266.21	2.33E-04	1.17E-05	2.10E-04	1.11E-03	NA
106	PP	266.21	2.33E-04	1.17E-05	2.10E-04	1.11E-03	NA
107	PP	317.18	2.78E-04	1.39E-05	2.50E-04	1.32E-03	NA
108	PP	266.21	2.33E-04	1.17E-05	2.10E-04	1.11E-03	NA
109	PP	266.21	2.33E-04	1.17E-05	2.10E-04	1.11E-03	NA
110	PP	317.18	2.78E-04	1.39E-05	2.50E-04	1.32E-03	NA
111	PP	292.78	2.56E-04	1.28E-05	2.31E-04	1.22E-03	NA
112	PP	317.18	2.78E-04	1.39E-05	2.50E-04	1.32E-03	NA
114	PP	317.18	2.78E-04	1.39E-05	2.50E-04	1.32E-03	NA
115	PP	317.18	2.78E-04	1.39E-05	2.50E-04	1.32E-03	NA
116	PP	292.78	2.56E-04	1.28E-05	2.31E-04	1.22E-03	NA
130	PP	252.75	2.21E-04	1.11E-05	1.99E-04	1.05E-03	NA
131	PP	257.71	2.26E-04	1.13E-05	2.03E-04	1.07E-03	NA
132	PP	255.33	2.24E-04	1.12E-05	2.01E-04	1.06E-03	NA
133	PP	244.44	2.14E-04	1.07E-05	1.93E-04	1.02E-03	NA
135	PP	276.05	2.42E-04	1.21E-05	2.18E-04	1.15E-03	NA
136	PP	244.82	2.14E-04	1.07E-05	1.93E-04	1.02E-03	NA
201	PP	60.79	5.33E-05	2.66E-06	4.79E-05	2.53E-04	NA
202	PP	131.28	1.15E-04	5.75E-06	1.03E-04	5.46E-04	NA
203	PP	191.63	1.68E-04	8.39E-06	1.51E-04	7.97E-04	NA
204	PP	234.58	2.05E-04	1.03E-05	1.85E-04	9.76E-04	NA
205	PP	219.59	1.92E-04	9.62E-06	1.73E-04	9.14E-04	NA
206	PP	99.12	8.68E-05	4.34E-06	7.81E-05	4.12E-04	NA
207	PP	94.54	8.28E-05	4.14E-06	7.45E-05	3.93E-04	NA
208	PP	79.30	6.95E-05	3.47E-06	6.25E-05	3.30E-04	NA
209	PP	85.90	7.53E-05	3.76E-06	6.77E-05	3.57E-04	NA
210	PP	101.32	8.88E-05	4.44E-06	7.99E-05	4.22E-04	NA
211	PP	82.90	7.26E-05	3.63E-06	6.54E-05	3.45E-04	NA
212	PP	338.81	2.97E-04	1.48E-05	2.67E-04	1.41E-03	NA
213	PP	286.68	2.51E-04	1.26E-05	2.26E-04	1.19E-03	NA
214	PP	97.59	8.55E-05	4.27E-06	7.69E-05	4.06E-04	NA
217	PP	126.15	1.11E-04	5.53E-06	9.95E-05	5.25E-04	NA
218	PP	146.39	1.28E-04	6.41E-06	1.15E-04	6.09E-04	NA
219	PP	98.81	8.66E-05	4.33E-06	7.79E-05	4.11E-04	NA
220	PP	218.06	1.91E-04	9.55E-06	1.72E-04	9.07E-04	NA
301	PP	22.66	1.98E-05	9.92E-07	1.79E-05	9.43E-05	NA
302	PP	22.66	1.98E-05	9.92E-07	1.79E-05	9.43E-05	NA
303	PP	26.43	2.32E-05	1.16E-06	2.08E-05	1.10E-04	NA
304	PP	22.66	1.98E-05	9.92E-07	1.79E-05	9.43E-05	NA
305	PP	19.82	1.74E-05	8.68E-07	1.56E-05	8.25E-05	NA
306	PP	22.66	1.98E-05	9.92E-07	1.79E-05	9.43E-05	NA
307	PP	22.66	1.98E-05	9.92E-07	1.79E-05	9.43E-05	NA
308	PP/PVC	15.86	1.39E-05	6.95E-07	1.25E-05	6.60E-05	NA
310	PP	46.26	4.05E-05	2.03E-06	3.65E-05	1.92E-04	NA
311	PP	46.26	4.05E-05	2.03E-06	3.65E-05	1.92E-04	NA
312	PP	31.72	2.78E-05	1.39E-06	2.50E-05	1.32E-04	NA

Appendix A: Emissions Calculations
Potential to Emit Hazardous Air Pollutants from the Injection Molding Machines

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

Dorel Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	Acetaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/hr)	Formaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)	Styrene Emissions (tons/yr)
313	PP	59.47	5.21E-05	2.60E-06	4.69E-05	2.47E-04	NA
314	PP	55.51	4.86E-05	2.43E-06	4.38E-05	2.31E-04	NA
315	PP	43.61	3.82E-05	1.91E-06	3.44E-05	1.81E-04	NA
319	PP	26.43	2.32E-05	1.16E-06	2.08E-05	1.10E-04	NA
320	PP/TPE	26.43	2.32E-05	1.16E-06	2.08E-05	1.10E-04	NA
321	PP/TPE	34.89	3.06E-05	1.53E-06	2.75E-05	1.45E-04	NA
322	PP	34.89	3.06E-05	1.53E-06	2.75E-05	1.45E-04	NA
323	PP	79.30	6.95E-05	3.47E-06	6.25E-05	3.30E-04	NA
324	PP	75.33	6.60E-05	3.30E-06	5.94E-05	3.13E-04	NA
400	PP	107.84	9.45E-05	4.72E-06	8.50E-05	4.49E-04	NA
401	PP/ABS	107.84	9.45E-05	4.72E-06	8.50E-05	4.49E-04	0.0614
402	PP/ABS	107.84	9.45E-05	4.72E-06	8.50E-05	4.49E-04	0.0614
403	PP/ABS	71.80	6.29E-05	3.14E-06	5.66E-05	2.99E-04	0.0409
404	PP	75.33	6.60E-05	3.30E-06	5.94E-05	3.13E-04	NA
408	PP	49.16	4.31E-05	2.15E-06	3.88E-05	2.05E-04	NA
409	PP	54.63	4.79E-05	2.39E-06	4.31E-05	2.27E-04	NA
410	PP	44.69	3.92E-05	1.96E-06	3.52E-05	1.86E-04	NA
411	PP	44.69	3.92E-05	1.96E-06	3.52E-05	1.86E-04	NA
433	PP	44.69	3.92E-05	1.96E-06	3.52E-05	1.86E-04	NA
421	PP	91.98	8.06E-05	4.03E-06	7.25E-05	3.83E-04	NA
422	PP	83.62	7.33E-05	3.66E-06	6.59E-05	3.48E-04	NA
423	PP	91.98	8.06E-05	4.03E-06	7.25E-05	3.83E-04	NA
424	PP	83.62	7.33E-05	3.66E-06	6.59E-05	3.48E-04	NA
425	PP	103.88	9.10E-05	4.55E-06	8.19E-05	4.32E-04	NA
429	PP/Nylon	82.47	7.22E-05	3.61E-06	6.50E-05	3.43E-04	1.16E-04
430	PP/Nylon	158.59	1.39E-04	6.95E-06	1.25E-04	6.60E-04	2.22E-04
431	PP	166.52	1.46E-04	7.29E-06	1.31E-04	6.93E-04	NA
432	PP	107.05	9.38E-05	4.69E-06	8.44E-05	4.45E-04	NA
501	PP	259.51	2.27E-04	1.14E-05	2.05E-04	1.08E-03	NA
524	PP	263.12	2.30E-04	1.15E-05	2.07E-04	1.09E-03	NA
503	PP	103.08	9.03E-05	4.52E-06	8.13E-05	4.29E-04	NA
504	PP	107.05	9.38E-05	4.69E-06	8.44E-05	4.45E-04	NA
505	PP	99.12	8.68E-05	4.34E-06	7.81E-05	4.12E-04	NA
506	PP	146.39	1.28E-04	6.41E-06	1.15E-04	6.09E-04	NA
507	PP	152.49	1.34E-04	6.68E-06	1.20E-04	6.35E-04	NA
508	PP	228.74	2.00E-04	1.00E-05	1.80E-04	9.52E-04	NA
509	PP	213.49	1.87E-04	9.35E-06	1.68E-04	8.88E-04	NA
520	PP	317.18	2.78E-04	1.39E-05	2.50E-04	1.32E-03	NA
521	PP	310.57	2.72E-04	1.36E-05	2.45E-04	1.29E-03	NA
522	PP	222.03	1.94E-04	9.72E-06	1.75E-04	9.24E-04	NA
523	PP	89.21	7.81E-05	3.91E-06	7.03E-05	3.71E-04	NA
502	PP	89.21	7.81E-05	3.91E-06	7.03E-05	3.71E-04	NA
525	PP	145.37	1.27E-04	6.37E-06	1.15E-04	6.05E-04	NA
526	PP	158.59	1.39E-04	6.95E-06	1.25E-04	6.60E-04	NA
527	PP	62.78	5.50E-05	2.75E-06	4.95E-05	2.61E-04	NA
528	PP	60.79	5.33E-05	2.66E-06	4.79E-05	2.53E-04	NA
529	PP	65.42	5.73E-05	2.87E-06	5.16E-05	2.72E-04	NA
		Totals	**0.01**	**6.00E-04**	**0.01**	**0.06**	**0.16**

Methodology

HAPs Emissions (tons/yr) = (Max Throughput Rate (lbs resin/hr) * Emission Factor (lbs/106 lbs) /1000000) * 8760 (hrs/yr) / 2000 (lbs/ton)

Notes

These calculations were submitted by the source and verified to be accurate by IDEM.

(1) Emission factors for HAPs from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 oF and reactor impact copolymer was used as the emission factor.

(2) Emission factors for HAPs from Nylon were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51 of the Journal of Air and Waste Management Association. The source uses two types of nylon, PA-66 and EPDM Toughened PA-66, and the worst case emission factor for each nylon were used.

(3) Emission factors for HAPs from Nylon were taken from the technical paper, "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins" from Volume 45 of the Journal of Air and Waste Management Association.

Appendix A: Emissions Calculations
Potential to Emit PM from the Plastic Granulation Operations,
Consisting of eight (8) scrap regrind machines

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

Maximum Hourly Injection Molding Machine Resin Throughput (lbs/hr)	13,692
Facility Wide Scrap (%)	3.5%
Maximum Hourly Scrap Throughput (lbs/hr)	479.22
Grinding Emission Factor for PM (lbs/ton) [(1)]	1.30E+01
Control Efficiency of Cyclone and Bagfilter system	97.0%
Potential Hourly Uncontrolled PM Emissions (lbs/hr)	3.11
Potential Hourly Controlled PM Emissions (lbs/hr)	0.09
Potential Annual Uncontrolled PM Emissions (tons/yr)	13.64
Potential Annual Controlled PM Emissions (tons/yr) [α]	**0.41**

Methodology

Maximum Hourly Scrap Throughput (lbs/hr) = Maximum Hourly Resin Throughput (lbs/hr) * Facility Wide Scrap (%)

Potential Hourly PM Emissions (lbs/hr) = Maximum Hourly Scrap Throughput (lbs/hr) * Grinding Emission Factor for PM (lbs/ton) / 2000 (lbs/ton) * (1 - Control Efficiency of Cyclone and Filter)

Potential Annual PM Emissions (tons/yr) = Potential Hourly PM Emissions (lbs/hr) *8760 (hrs/yr) / 2000 (lbs/ton)

Notes

These calculations were submitted by the source and verified to be accurate by IDEM.

[(1)] No AP-42 emission factors exist for the grinding of thermoplastics. Therefore, the EPA Webfire emission factor for Fiberglass Resin Products - Plastics Machining: Drilling/Sanding/Sawing/etc. (SCC 30800701), has been used.

[α] The control equipment, consisting of eight (8) bagfilters and one (1) cyclone, serving the scrap regrind operations has been determined integral to the process. Therefore, the potential to emit is considered after the control device.

Appendix A: Emissions Calculations
Potential to Emit Volitile Organic Compounds (VOCs)
and Hazardous Air Pollutants (HAPs)
from Clean-up Solvent Usage

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

Potential VOC Emissions for Cleanup Solvent Usage

Area of Cleanup Solvent Usage	Product Name	Manufacturer	Estimated Max Usage (gal/month)	Scaled Max Usage [1] (gal/month)	Scaled Max Usage (gal/yr)	Density (lbs/gal)	VOC Content (wt%)	VOC Emissions (tons/yr)
Injection Molding	Bulk Mold Cleaner	Stoner	10.00	14.00	168.00	12.10	100%	1.02
Injection Molding	Aerosol Mold Cleaner	Slide	3.00	4.20	50.40	12.10	100%	0.30
					218.40		**Total**	**1.32**

Potential HAP Emissions for Cleanup Solvent Usage

Area of Cleanup Solvent Usage	Product Name	Manufacturer	Estimated Max Usage (gal/month)	Scaled Max Usage [1] (gal/month)	Scaled Max Usage (gal/yr)	Density (lbs/gal)	Trichloroethylene Content (wt%)	Trichloroethylene Emissions (tons/yr)
Injection Molding	Bulk Mold Cleaner	Stoner	10.00	14.00	168.00	12.10	100%	1.02
Injection Molding	Aerosol Mold Cleaner	Slide	3.00	4.20	50.40	12.10	95%	0.29
					218.40		**Total**	**1.31**

Methodology

Scaled Max Usage (gal/month) = Estimated Max Usage (gal/month) * 1.4 [1]
Scaled Max Usage (gal/yr) = Scaled Max Usage (gal/month) * 12 months/yr
VOC/HAP Emissions (tons/yr) = Scaled Max Usage (gal/month) * Density (lbs/gal) * VOC Content (wt%) * 1 ton / 2000 lbs

Notes

These calculations were submitted by the source and verified to be accurate by IDEM.

[1] Estimated Maximum Usage (provided by the source) was scaled by a factor of 1.4 to reflect an 8,760 hour operating year instead of the plants 6,240 hour operating year. Both the VOC and HAP emissions are based on the Scaled Max Usage.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
from the Comfort Space Heaters with a maximum
rated heat input capacity of < 10 mmBtu/hr, each

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

Combustion Source	Heat Input per Unit (mmBtu/hr)	Number of Units	Total Heat Input (MMBtu/hr)
Comfort Space Heaters	0.120	2	0.240
Comfort Space Heaters	0.140	2	0.280
Comfort Space Heaters	0.150	5	0.750
Comfort Space Heaters	0.160	17	2.720
Comfort Space Heaters	0.175	4	0.700
Comfort Space Heaters	0.200	1	0.200
Comfort Space Heaters	0.270	17	4.590
Comfort Space Heaters	0.275	3	0.825
Comfort Space Heaters	0.300	1	0.300
Comfort Space Heaters	0.320	2	0.640
Comfort Space Heaters	0.400	10	4.000
Comfort Space Heaters	0.700	4	2.800
Comfort Space Heaters	1.875	1	1.875
Comfort Space Heaters	2.200	2	4.400
Comfort Space Heaters	2.781	1	2.781
Comfort Space Heaters	3.287	3	9.861
	Total	**75**	**36.96**

Maximum Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
36.96	323.79

Criteria Pollutant Emissions

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	Nox **	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	5.7	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.308	1.230	0.923	0.097	16.19	0.89	13.60

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

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

HAPs Emissions

	Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
Potential Emission in tons/yr	3.40E-04	1.94E-04	0.012	0.291	5.50E-04

	Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	8.09E-05	1.78E-04	2.27E-04	6.15E-05	3.40E-04

Total HAPs =	0.306	tons/yr
Worst Single HA P =	0.291	tons/yr

Notes
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
All emission factors are based on normal firing.
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).

Methodology
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Dorel Juvenile Group, Inc.
Address City IN Zip: 2525 State Street, Columbus, IN 47201
Permit No.: R005-28577-00102
Reviewer: Hannah L. Desrosiers
Date Submitted: 10/15/2009

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Informtation (provided by source)

Vehicle Type	Maximum number of vehicles	Maximum number of one-way trips per day per vehicle type	Maximum trips per day (trip/day)	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle & Load (tons/trip)	Total Weight driven per day (ton/day)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Personal Car/Truck	195.0	2.0	390.0	2.0	0.7	2.7	1,053.0	384,345.0	1,350.0	0.3	99.7	36,396.3
Freight Truck (6 axles)	4.0	2.0	8.0	16.0	32.0	48.0	384.0	140,160.0	1,350.0	0.3	2.0	746.6
Front Loader	2.0	6.0	12.0	15.0	4.1	19.1	229.2	83,658.0	50.0	0.0	0.1	41.5
		Total	**410.0**			**69.8**	**1,666.2**	**608,163.0**	**2,750.0**	**0.5**	**101.9**	**37,184.4**

Average Vehicle Weight Per Trip = 4.1 tons/trip
Average Miles Per Trip = 0.25 miles/trip

Unmitigated Emission Factor, Ef = k*[(sL/2)^0.65]*[(W/3)^1.5] - C (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	4.1	4.1	4.1	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m^2 = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)]
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.06	0.011	1.37E-03	lb/mile
Mitigated Emission Factor, Eext =	0.05	0.010	1.25E-03	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Personal Car/Truck	1.07E+00	2.01E-01	2.49E-02	9.76E-01	1.84E-01	2.28E-02	4.88E-01	9.21E-02	1.14E-02
Freight Truck (6 axles)	2.19E-02	4.13E-03	5.11E-04	2.00E-02	3.78E-03	4.68E-04	1.00E-02	1.89E-03	2.34E-04
Front Loader	1.22E-03	2.29E-04	2.84E-05	1.11E-03	2.10E-04	2.60E-05	5.56E-04	1.05E-04	1.30E-05
	1.0903	**0.2057**	**0.0255**	**0.9969**	**0.1881**	**0.0233**	**0.4985**	**0.0940**	**0.0116**

Methodology
Maximum trips per day (trip/day) = [Maximum number of vehicles * Maximum number of one-way trips per day per vehicle type]
Maximum Weight of Vehicle & Load (tons/trip) = [Maximum Weight of Vehicle (tons) + Maximum Weight of Load (tons)]
Total Weight driven per day (ton/day) = [Maximum Weight of Vehicle & Load (tons/trip)] * [Maximum trips per day (trip/day)]
Total Weight driven per year (ton/yr) = [Maximum trips per day (trip/day) * 365 days/yr]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Maximum one-way miles (miles/yr) = [[Maximum one-way distance (mi/day) * 365 days/yr]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations
PM = Particulate Matter PM10 = Particulate Matter (<10 um) PTE = Potential to Emit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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TO: Jeff Sciutto
Dorel Juvenile Group
2525 State St
Columbus, IN 47201

DATE: January 21, 2010

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

SUBJECT: Final Decision
Registration
005-28577-00102

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Jeremy Palin, Consultant, Cornerstone Environmental
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 1/21/2010 Dorel Juvenile Group, Inc. 005-28577-00102 Final			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Mr. Elbert Held 734 Hutchins Columbus IN 47201 *(Affected Party)*									
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4		Eileen Booher 1316 Chestnut St. Columbus IN 47201 *(Affected Party)*									
5		Mr. Lcnfc 1039 Sycamore St Columbus IN 47201 *(Affected Party)*									
6		Bartholomew County Commissioners 440 Third Street Columbus IN 47202 *(Local Official)*									
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10		Mr. Charles Mitch 3210 Grove Parkway Columbus IN 47203 *(Affected Party)*									
11		Edinburgh Town Council and Town Manager P.O. Box 65 Edinburgh IN 46124 *(Local Official)*									
12		Bartholomew County Health Department 440 3rd Street, Suite 303 Columbus IN 47201 *(Health Department)*									
13		Mr. Jeremy Palin Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Ct Zionsville IN 46077 (Consultant)									
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