



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 25, 2010

RE: Cryovac Rigid Packaging / 097 - 28770 - 00093

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

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Cryovac Rigid Packaging, Sealed Air Corporation
7950 North Allison Avenue
Indianapolis, Indiana 46268**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T097-28770-00093	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 25, 2010 Expiration Date: August 25, 2015

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Source Address:	7950 North Allison Avenue, Indianapolis, Indiana 46268
Mailing Address:	7950 N. Allison Avenue, Indianapolis, Indiana 46268
General Source Phone Number:	(317) 876-4112
SIC Code:	3086
County Location:	Marion
Source Location Status:	Basic nonattainment for PM _{2.5}
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) Two (2) pentane storage tanks with vapor recovery systems, identified as emission unit #1, installed in 1996, each with a maximum capacity of 16, 400 gallons, exhausting to stack #1.
- (b) Four (4) polystyrene extruding lines, each consisting of one (1) extruder (#210 and #220, installed in 1979; #230, installed in 1983; #240, installed in 1985), and two (2) winders, with a total maximum throughput of 4,700 pounds per hour, identified as emission unit #2, and exhausting to stacks # 2a, 2b, 2c, and 2d.
- (c) One (1) roll lot, identified as emission unit #3, with a maximum usage of 10, 000 pounds per hour of polystyrene foam sheets, constructed in 1979, and exhausting to stack #3.
- (d) Four (4) grinders for extrusion scrap foam and spoilage foam, with cyclones and a vacuum conveying system for transporting scrap foam to storage silo, with a combined maximum usage of 4,500 pounds per hour of polystyrene foam sheet, and exhausting to stack #4. Three grinders, identified as emission unit #4, were installed in 1979. One grinder, identified as emission unit #5, was installed in 1984.
- (e) Ten (10) thermoformers, identified as emission unit #6, installed in 1979 through 1999, with a combined maximum capacity of 15,400 pounds per hour, and exhausting to stack #6.
- (f) One (1) warehouse for final product storage and handling, identified as emission unit #8, constructed in 1979, with a maximum capacity of 17,500 pounds per hour, and exhausting to stack #8.
- (g) Ten (10) underpress and ten (10) beside-the-press grinders and a conveying system for trim and startup scrap, with the cyclones between the grinders and fluff silos, with a maximum usage 9,000 pounds per hour, installed in 1979 through 1999, collectively identified as emission unit #9, and exhausting to stack #9.

- (h) One (1) fluff conveying system, identified as emission unit #10, for conveying fluff from fluff silos to reclaim extruders, using two (2) cyclones as particulate control, installed in 1979, with a maximum capacity of 9,000 pounds per hour, and exhausting to stack #10.
- (i) Two (2) Reclaim Extruders #510 and #520, identified as emission unit #11, installed in 1980, with a maximum capacity of 2,500 pounds per hour, and exhausting to Stack #11, "Reclaim Flash" incinerator.
- (j) One (1) Extruding Line #251, identified as emission unit #12, installed in 1999, with a maximum capacity of 1,500 pounds per hour, and exhausting to stacks # 2e, 2f, and 2g, approved for modification in 2007 for Polylactic Acid (PLA) foam production.
- (k) Five (5) thermoformers #11 through #15, identified as emission unit #14, installed in 1999 and 2000, with a maximum capacity of 10,950 pounds per hour, and exhausting to stack #6.
- (l) One (1) reclaim extruder #530, identified as emission unit #15, installed in 1999 and 2000, with a maximum capacity of 2,000 pounds per hour, and exhausting to stack #11, "Reclaim Flash" incinerator.
- (m) Two (2) grinders, identified as emission unit #16, for extrusion scrap and spoilage foam with cyclones and vacuum conveying system for transportation to storage silo, installed in 1999 and 2000, with a maximum capacity of 5,000 pounds per hour, and exhausting to stack #4.
- (n) Five (5) underpress grinders and conveying system, identified as emission unit #17, for trim scrap with cyclones between grinders and fluff silos, installed 1999 and 2000, with a maximum capacity of 14,000 pounds per hour, and exhausting to stack #9.
- (o) One (1) fluff conveying system, identified as emissions unit #18, for conveying fluff from fluff silos to new reclaim extruder with a cyclone, with a maximum capacity of 4,500 pounds per hour, and exhausting to stack #10.
- (p) One (1) Agglomerator for recycling Polylactic Acid (PLA) foam scrap, identified as Emission Unit #19, approved for construction in 2007, with a maximum capacity of 300 pounds per hour, using a baghouse identified as "Dust Collector" for control and exhausting to stack #19.
- (q) One (1) PLA foam fluff conveying system for conveying fluff from a thermoformer to a fluff silo, identified as emission unit #20, approved for construction in 2007, with a maximum capacity of 2,000 pounds per hour, using a cyclone for control and exhausting to stack #9.
- (r) One (1) PLA foam fluff conveying system for conveying fluff from a fluff silo to the Agglomerator, identified as emission unit #21, approved for construction in 2007, with a maximum capacity of 1,000 pounds per hour and exhausting to stack #20.

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

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

- (a) Parts cleaner and degreaser, 33 gal capacity, using Naphtha, 150⁰F flash point, refilled 3 times per year. [326 IAC 8-3]
- (b) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3]

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

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T097-28770-00093, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

- (ii) the certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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, Indiana 46204-2251

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the

affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T097-28770-00093 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

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

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a

deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) pentane storage tanks with vapor recovery systems, identified as emission unit #1, installed in 1996, each with a maximum capacity of 16,400 gallons, and exhausting to stack #1.
- (b) Four (4) polystyrene extruding lines, each consisting of one (1) extruder (#210 and #220, installed in 1979; #230, installed in 1983; #240, installed in 1985), and two (2) winders, with a total maximum throughput of 4,700 pounds per hour, identified as emission unit #2, and exhausting to stacks # 2a, 2b, 2c, and 2d.
- (c) One (1) roll lot, identified as emission unit #3, with a maximum usage of 10,000 pounds per hour of polystyrene foam sheets, constructed in 1979, and exhausting to stack #3.
- (d) Four (4) grinders for extrusion scrap foam and spoilage foam, with cyclones and a vacuum conveying system for transporting scrap foam to storage silo, with a combined maximum usage of 4,500 pounds per hour of polystyrene foam sheet, and exhausting to stack #4. Three grinders, identified as emission unit #4, were installed in 1979. One grinder, identified as emission unit #5, was installed in 1984.
- (e) Ten (10) thermoformers, identified as emission unit #6, installed in 1979 through 1999, with a combined maximum capacity of 15,400 pounds per hour, and exhausting to stack #6.
- (g) One (1) warehouse for final product storage and handling, identified as emission unit #8, constructed in 1979, with a maximum capacity of 17,500 pounds per hour, and exhausting to stack #8.
- (g) Ten (10) underpress and ten (10) beside-the-press grinders and a conveying system for trim and startup scrap, with the cyclones between the grinders and fluff silos, with a maximum usage 9,000 pounds per hour, installed in 1979 through 1999, collectively identified as emission unit #9, and exhausting to stack #9.
- (h) One (1) fluff conveying system, identified as emission unit #10, for conveying fluff from fluff silos to reclaim extruders, using two (2) cyclones as particulate control, installed in 1979, with a maximum capacity of 9,000 pounds per hour, and exhausting to stack #10.
- (i) Two (2) Reclaim Extruders #510 and #520, identified as emission unit #11, installed in 1980, with a maximum capacity of 2,500 pounds per hour, and exhausting to Stack #11, "Reclaim Flash" incinerator.
- (j) One (1) Extruding Line #251, identified as emission units #12, installed in 1999, with a maximum capacity of 1,500 pounds per hour, and exhausting to stacks # 2e, 2f, and 2g, approved for modification in 2007 for Polylactic Acid (PLA) foam production.
- (k) Five (5) thermoformers #11 through #15, identified as emission unit #14, installed in 1999 and 2000, with a maximum capacity of 10,950 pounds per hour, and exhausting to stack #6.
- (m) One (1) reclaim extruder #530, identified as emission unit #15, installed in 1999 and 2000, with a maximum capacity of 2,000 pounds per hour, and exhausting to stack #11, "Reclaim Flash" incinerator.

- (m) Two (2) grinders, identified as emission unit #16, for extrusion scrap and spoilage foam with cyclones and vacuum conveying system for transportation to storage silo, installed in 1999 and 2000, with a maximum capacity of 5,000 pounds per hour, and exhausting to stack #4.
- (n) Five (5) underpress grinders and conveying system, identified as emission unit #17, for trim scrap with cyclones between grinders and fluff silos, installed 1999 and 2000, with a maximum capacity of 14,000 pounds per hour, and exhausting to stack #9.
- (o) One (1) fluff conveying system, identified as emissions unit #18, for conveying fluff from fluff silos to new reclaim extruder with a cyclone, with a maximum capacity of 4,500 pounds per hour, and exhausting to stack #10.
- (p) One (1) Agglomerator for recycling Polylactic Acid (PLA) foam scrap, identified as Emission Unit #19, approved for construction in 2007, with a maximum capacity of 300 pounds per hour, using a baghouse identified as "Dust Collector" for control and exhausting to stack #19.
- (q) One (1) PLA foam fluff conveying system for conveying fluff from a thermoformer to a fluff silo, identified as emission unit #20, approved for construction in 2007, with a maximum capacity of 2,000 pounds per hour, using a cyclone for control and exhausting to stack #9.
- (r) One (1) PLA foam fluff conveying system for conveying fluff from a fluff silo to the Agglomerator, identified as emission unit #21, approved for construction in 2007, with a maximum capacity of 1,000 pounds per hour and exhausting to stack #20.

(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 2-7-5(1)]

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

- (a) Pursuant to Construction Permit CP 097-5348-00093, issued on November 4, 1997, this source shall reduce VOC emissions using best available control technology (BACT). Emissions from the reclaim extruders, identified as emissions units #11 and 15, shall be controlled by the "Reclaim Flash" incinerator, which shall be in operation at all times the reclaim extruders are in operation.
- (b) When operating the reclaim extruders, the "Reclaim Flash" incinerator shall maintain a minimum operating temperature to maintain at least 90% overall destruction of the VOC captured.
- (c) Material usage of resin shall be limited to 28, 546 tons of resin per twelve (12) consecutive month period, rolled on a monthly basis. Material usage of pentane, isobutane or a combination of pentane and isobutane as a blowing agent shall be limited to 1,316 tons per twelve (12) consecutive month period, rolled on a monthly basis. These limits results in the VOC emissions from emission units #2, #3, #6, #8, #10, #11, #12, #14, #15, #18, #19, #20, and #21 of 805.3 tons per twelve (12) consecutive month period after control, with compliance determined at the end of each month.

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

- (a) Pursuant to 326 IAC 6-3-2(c), the particulate matter (PM) from the extrusion foam and trim scrap grinding and conveying processes (emission units #4, #5, #9, #10, #16, #17, #18, #19, #20, and #21) shall be limited by the following:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and;
P = process weight rate in tons per hour.

Emission Unit	Process Weight Rate (tons/hour)	Emission Rate (lbs/hour)
4	2.25	7.06
5	2.25	7.06
9	4.5	11.23
10	4.5	11.23
16	2.5	7.57
17	7.0	15.10
18	2.25	7.06
19	0.15	1.15
20	1.0	4.10
21	0.5	2.57

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

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

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

Compliance Determination Requirements

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

The Permittee shall conduct a performance test to verify VOC control efficiency, as per condition D.1.1(b), for the "Reclaim Flash" incinerator utilizing methods as approved by the Commissioner. This test shall determine a minimum operating temperature to achieve 90% VOC control. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

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

D.1.6 Particulate Matter (PM)

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

D.1.7 Parametric Monitoring of the Incinerator

- (a) The Permittee shall determine the appropriate operating temperature of the incinerator from the most recent valid stack test that demonstrates compliance with D.1.1, as approved by IDEM, OAQ.
- (b) The Permittee shall utilize a continuous strip chart to record the operating temperature of the "Reclaim Flash" incinerator. At least once per twenty-four hour period, when the incinerator is in operation, the Permittee shall observe and record the minimum operating temperature

recorded on the strip chart during operations. The operating temperature shall be maintained at or above the temperature as established in the most recent compliant stack test.

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

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the extrusion foam, trim scrap grinding, and fluff conveying process (emission units #4, 5, 9, 10, 16, 17, 18, 19, 20, and 21) cyclones shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Permittee shall include in its daily record when a visible emissions notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).
- (f) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.9 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 line. 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 B - Emergency Provisions).

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1 (c), the Permittee shall maintain records of resin usage and combined pentane and isobutane usage. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and resin usage limits and/or the VOC emission limits established in Condition D.1.1(c).
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document the compliance status with Condition D.1.7, the Permittee shall, once each 24 hour period, maintain records of the minimum operating temperature recorded by the strip chart during each 24 hour period.
- (d) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of visible emission notations once per day for stack exhaust from emission units # 4, 9, 10, 16,

and 17. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

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

D.1.11 Reporting Requirements

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Parts cleaner and degreaser, 33 gal capacity, using Naphtha, 150⁰F flash point, refilled 3 times per year.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

The degreasing operation shall comply with the following requirements:

- (a) Pursuant to 326 IAC 8-3-2, the owner or operator shall:
- (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements; and
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one hand if:
 - (A) The solvent volatility is greater than three-tenths (0.3) pounds per square inch (15 millimeters of mercury) measured at thirty-eight degrees Celsius (38⁰C) (100 degrees Fahrenheit);
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38⁰C) (one hundred degrees Fahrenheit (100⁰F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5(b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Cryovac Rigid Packaging, Sealed Air Corporation
Source Address: 7950 North Allison Avenue, Indianapolis, Indiana 46268
Mailing Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: T097-28770-00093

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Cryovac Rigid Packaging, Sealed Air Corporation
Source Address: 7950 North Allison Avenue, Indianapolis, Indiana 46268
Mailing Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: T097-28770-00093

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Usage Report

Source Name: Cryovac Rigid Packaging, Sealed Air Corporation
 Source Address: 7950 North Allison Avenue, Indianapolis, Indiana 46268
 Mailing Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
 Part 70 Permit No.: T097-28770-00093
 Facility: Emission Units #2, #3, #6, #8, #10, #11, #12, #14, #15, #18, #19, #20, and #21
 Parameter: Resin and blowing agent usage
 Limit: 28,546 tons per twelve (12) consecutive months of resin; 1,316 tons per twelve (12) consecutive months of pentane, isobutane, or a combination of pentane and isobutane blowing agent.

YEAR: _____ QUARTER: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 months		12 Month Total	
	Pentane & Isobutane	Resin	Pentane & Isobutane	Resin	Pentane & Isobutane	Resin
Month 1						
Month 2						
Month 3						

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Cryovac Rigid Packaging, Sealed Air Corporation
Source Address: 7950 North Allison Avenue, Indianapolis, Indiana 46268
Mailing Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: T097-28770-00093

Months: _____ to Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Cryovac Rigid Packaging, Sealed Air Corporation
Source Location:	7950 N. Allison Avenue
County:	Marion
SIC Code:	3086
Permit Renewal No.:	T097-28770-00093
Permit Reviewer:	Donald McQuigg

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Cryovac Rigid Packaging, Sealed Air Corporation, relating to the operation of a stationary plastic extrusion and thermoforming facility producing polystyrene extruded foam products.

History

On December 21, 2009, Cryovac Rigid Packaging, Sealed Air Corporation submitted an application to the OAQ requesting to renew its operating permit. Cryovac Rigid Packaging, Sealed Air Corporation was issued a Part 70 Operating Permit Renewal on October 5, 2005. The source was previously operated as Formpac Division- W.R. Grace Company until the name change on April 1, 1998.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) pentane storage tanks with vapor recovery systems, identified as emission unit #1, installed in 1996, each with a maximum capacity of 16, 400 gallons, and exhausting to stack #1.
- (b) Four (4) polystyrene extruding lines, each consisting of one (1) extruder (#210 and #220, installed in 1979; #230, installed in 1983; #240, installed in 1985), and two (2) winders, with a total maximum throughput of 4,700 pounds per hour, identified as emission unit #2, and exhausting to stacks # 2a, 2b, 2c, and 2d.
- (c) One (1) roll lot, identified as emission unit #3, with a maximum usage of 10,000 pounds per hour of polystyrene foam sheets, constructed in 1979, and exhausting to stack #3.
- (d) Four (4) grinders for extrusion scrap foam and spoilage foam, with cyclones and a vacuum conveying system for transporting scrap foam to storage silo, with a combined maximum usage of 4,500 pounds per hour of polystyrene foam sheet, and exhausting to stack #4. Three grinders, identified as emission unit #4, were installed in 1979. One grinder, identified as emission unit #5, was installed in 1984.
- (e) Ten (10) thermoformers, identified as emission unit #6, installed in 1979 through 1999, with a combined maximum capacity of 15,400 pounds per hour, and exhausting to stack #6.
- (f) One (1) warehouse for final product storage and handling, identified as emission unit #8, constructed in 1979, with a maximum capacity of 17,500 pounds per hour, and exhausting to stack #8.

- (g) Ten (10) underpress and ten (10) beside-the-press grinders and a conveying system for trim and startup scrap, with the cyclones between the grinders and fluff silos, with a maximum usage 9,000 pounds per hour, installed in 1979 through 1999, collectively identified as emission unit #9, and exhausting to stack #9.
- (h) One (1) fluff conveying system, identified as emission unit #10, for conveying fluff from fluff silos to reclaim extruders, using two (2) cyclones as particulate control, installed in 1979, with a maximum capacity of 9,000 pounds per hour, and exhausting to stack #10.
- (i) Two (2) Reclaim Extruders #510 and #520, identified as emission unit #11, installed in 1980, with a maximum capacity of 2,500 pounds per hour, and exhausting to Stack #11, "Reclaim Flash" incinerator.
- (j) One (1) Extruding Line #251, identified as emission units #12, installed in 1999, with a maximum capacity of 1,500 pounds per hour, and exhausting to stacks # 2e, 2f, and 2g, approved for modification in 2007 for Polylactic Acid (PLA) foam production.
- (k) Five (5) thermoformers #11 through #15, identified as emission unit #14, installed in 1999 and 2000, with a maximum capacity of 10,950 pounds per hour, and exhausting to stack #6.
- (l) One (1) reclaim extruder #530, identified as emission unit #15, installed in 1999 and 2000, with a maximum capacity of 2,000 pounds per hour, and exhausting to stack #11, "Reclaim Flash" incinerator.
- (m) Two (2) grinders, identified as emission unit #16, for extrusion scrap and spoilage foam with cyclones and vacuum conveying system for transportation to storage silo, installed in 1999 and 2000, with a maximum capacity of 5,000 pounds per hour, and exhausting to stack #4.
- (n) Five (5) underpress grinders and conveying system, identified as emission unit #17, for trim scrap with cyclones between grinders and fluff silos, installed 1999 and 2000, with a maximum capacity of 14,000 pounds per hour, and exhausting to stack #9.
- (o) One (1) fluff conveying system, identified as emissions unit #18, for conveying fluff from fluff silos to new reclaim extruder with a cyclone, with a maximum capacity of 4,500 pounds per hour, and exhausting to stack #10.
- (p) One (1) Agglomerator for recycling Polylactic Acid (PLA) foam scrap, identified as Emission Unit #19, installed in 2007, with a maximum capacity of 300 pounds per hour, using a baghouse identified as "Dust Collector" for control and exhausting to stack #19.
- (q) One (1) PLA foam fluff conveying system for conveying fluff from a thermoformer to a fluff silo, identified as emission unit #20, installed in 2007, with a maximum capacity of 2,000 pounds per hour, using a cyclone for control and exhausting to stack #9.
- (r) One (1) PLA foam fluff conveying system for conveying fluff from a fluff silo to the Agglomerator, identified as emission unit #21, installed in 2007, with a maximum capacity of 1,000 pounds per hour and exhausting to stack #20.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (1) Seven (7) Trane roof top space heaters in the warehouse, total heat input capacity is 2.1 MMBtu/hr;
 - (2) Overhead door heater, heat input capacity 0.7 MMBtu/hr;
 - (3) Eight (8) Reznor hanging heater units: total heat input capacity 1.6 MMBtu/hr.
- (b) Equipment powered by internal combustion engines of capacity equal or less than 500,000 Btu/hr: Emergency generator, propane fuel fired, 86 kW.
 - (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Parts cleaner and degreaser, 33 gal capacity, using Naphtha, 150^o F flash point, refilled three (3) times per year. [326 IAC 8-3]
 - (d) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20^o C (68^o F), the use of which for all the cleaners and solvents combined does not exceed 145 gallons per twelve (12) months.
 - (e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]
 - (f) Closed loop heating and cooling systems.
 - (g) Forced and induced draft cooling tower system not regulated under a NESHAP.
 - (h) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3]
 - (i) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
 - (j) Enclosed systems for conveying plastic raw materials and plastic finished goods.
 - (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structured, or vehicles at the source where air emissions from those activities would not be associated with any production process.
 - (l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
 - (m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; cooling tower.
 - (n) On-site fire and emergency response training approved by the department.
 - (o) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kiloPascals measured at 38^o C).
 - (p) A laboratory as defined in 326 IAC 2-7-1(21)(C).
 - (q) Other activities or categories not previously identified:
 - (1) VOC emissions from resin conveying system.
 - (r) One (1) pressurized storage tank for isobutane, installed in 2010, considered a trivial activity under 326 IAC 2-7-1(40)(J)(i)(FF).

Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal T097-18849-00093 on October 5, 2005, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 097-27738-00093 issued on April 16, 2009;
- (b) Minor Permit Modification No. 097-25330-00093 issued on January 25, 2008; and
- (c) Minor Source Modification No. 097-25311-00093 issued on November 30, 2007.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 Operating Permit Renewal:

- (a) PSD/8-1-6 BACT

The PSD/8-1-6 BACT determination in CP 097-5348-00093 only considered the use of pentane as a blowing agent. In order to provide operational flexibility, the source has requested to be permitted for the use of isobutane as an alternative blowing agent for some products. Isobutane would substitute for pentane use on a mass basis; therefore, there would be no increase in blowing agent usage. Isobutane is chemically similar to pentane and is not a HAP. IDEM is aware of other facilities that use thermal incineration for isobutane emissions control. IDEM, OAQ, considers isobutane equivalent to pentane with respect to thermal incineration control technology; therefore, this revision to the BACT is only descriptive in nature.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

- (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. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions, and the effective date of these rules was July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

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

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	1.40
PM ₁₀	0.895
PM _{2.5}	0.895
SO ₂	<0.1
VOC	>250
CO	1.9
NO _x	0.1

HAPs	tons/year
styrene	1.18
ethylbenzene	0.17
Total	1.35

Appendix A of this TSD reflects the unrestricted potential emissions calculations of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (100) tons per year.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Extruding lines/EU #2 & #12	0.24	0.136	0.136	-	-	805.3	-	1.35	1.17 (styrene)
Thermoformers/EU #6 & #14				-	-		-	-	
Warehouse/EU #8				-	-		-	-	
Roll lot/EU #3				-	-		-	-	
Extrusion foam grinders/EU #4 & #5				-	-		-	-	
Fluff Conveying/EU #10 & #18				-	-		-	-	
Reclaim Extruders /EU #11 & #15				-	-		-	-	
Scrap & underpress grinders/EU #16 & #17				-	-		-	-	
PLA fluff conveying /EU #20 & #21	0.776	0.439	0.439	-	-	-	-	-	
PLA agglomerator/EU #19	0.388	0.220	0.220	-	-	-	-	-	
Insignificant Activities	negl	0.1	0.1	negl	0.1	0.6	1.9	negl	-
Total PTE of Entire Source	1.40	0.895	0.895	negl	0.1	805.9	1.9	1.35	1.17
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA
negl. = negligible emissions, <0.1 tons per year "-" = denotes no criteria pollutants emitted NA = not applicable *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) This existing stationary source is major for PSD because the emissions of at least one (1) attainment pollutant are greater than two hundred fifty (>250) tons per year, and is not one (1) of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutant, PM_{2.5}, are less than one hundred (<100) tons per year.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Extruder EU #11 / VOC	"Flash Reclaim" incinerator	Y	46.43	4.65	100	N	N
Extruder EU #15 / VOC	"Flash Reclaim" incinerator	Y	46.43	4.65	100	N	N
Polystyrene foam EU #4, #5, #9, #10, #16, #17, #18/ PM/PM ₁₀	cyclones	Y	0.24 ⁽¹⁾	<0.24	100	N	N
PLA foam EU #19, #20, #21/ PM/PM ₁₀	cyclones	Y	1.16 ⁽²⁾	<1.16	100	N	N

(1) Uncontrolled PM₁₀ emissions, assuming all PM is PM₁₀, was obtained from emission factor stack testing on all polystyrene foam cyclones collectively. Therefore, no individual cyclone will exceed this value.

(2) Uncontrolled PM₁₀ emissions, assuming all PM is PM₁₀, was obtained from emission factor stack testing on all PLA foam cyclones collectively. Therefore, no individual cyclone will exceed this value.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) This source is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb), because the two (2) pentane storage tanks, identified as emission unit #1, have capacities of less than seventy-five (75) cubic meters (m³), they were installed after July 23, 1984, and they store volatile organic liquid.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group I Polymers and Resins, Subpart U are not included in the permit because the source does not include Elastomer Product Process Units and polystyrene foam is not an elastomer.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants for Flexible Polyurethane Foam Production, Subpart III are not included in the permit because the source does not produce flexible polyurethane foam or rebond foam.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group IV Polymers and Resins, Subpart JJJ are not included in the permit because the source is not a major source of Hazardous Air Pollutants.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plans)

The source is subject to 326 IAC 1-6-3. A preventive maintenance plan was submitted on July 24, 2001.

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

This source is a major source, and was first constructed in 1979. It is not one (1) of the twenty-eight (28) listed source categories. The modification CP097-5348-00093, issued November 4, 1997, and superseded by T097-6114-00093, was subject to PSD review, because its potential emissions of VOC were greater than forty (40) tons per year.

- (a) VOC emissions will be reduced using the best available control technology (BACT):
- (1) Emissions of VOC from the reclaim extruders, emission units #11 and #15, shall be directed to the "Reclaim Flash" incinerator.
 - (2) When operating, the "Reclaim Flash" incinerator shall maintain a minimum operating temperature to maintain at least 90% overall destruction of the VOC captured.
- (b) The BACT analysis, conducted under CP097-5348-00093, and as revised in this permit, is considered adequate for the whole source. The results of the BACT analysis are as follows:
- (1) Using pentane and/or isobutane as the blowing agent causes majority of the emissions to occur at the extrusion, known as the extruder building fugitive, scrap grinding, reclaim flash, and warehousing.
 - (2) Effective capture for the pentane and/or isobutane emissions from each process will require enclosure of each process area and control of the flows. However, fire prevention is primary concern in the polystyrene production; in order to minimize the potential for fire, VOC laden air in each area has to be ventilated, which drives up the cost of control because of the much bigger air streams.
- (c) The BACT was determined to be the addition of incineration at the Reclaim Flash, and resin and blowing agent (pentane and/or isobutane) usage limitation to restrict the VOC emissions.
- (d) By using BACT, the VOC emissions shall be limited to 805.3 tons per twelve (12) consecutive month period, rolled on a monthly basis, which is equivalent to the material usage before control limit of 28,546 tons of resin and 1,316 tons of pentane and/or isobutane as a blowing agent per twelve (12) consecutive month period, rolled on a monthly basis.
- (e) The Reclaim Flash incinerator shall be in operation at all times the reclaim extruders, emission units #11 and #15, are in operation, in order to comply with this limit.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The Permittee emits less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program and the source has the potential to emit annual emissions greater than or equal to two hundred fifty (250) tons per year of VOC. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1 every year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 the permit:

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

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-2(c), the particulate matter (PM) from the extrusion, foam and trim scrap grinding, and conveying processes (emission units #4, 5, 9, 10, 16, 17, 18, 19, 20, and 21) shall be limited by the following:

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

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

The process weight rates and corresponding emissions limits are as follows:

Emission Unit	Process Weight Rate (tons/hour)	Emission Rate (lbs/hour)
4	2.25	7.06
5	2.25	7.06
9	4.5	11.23
10	4.5	11.23
16	2.5	7.57
17	7.0	15.10
18	2.25	7.06
19	0.15	1.15
20	1.0	4.10
21	0.5	2.57

The fluff conveying system cyclones shall be in operation at all times the grinders and conveying systems are in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2(e)(2), when the process weight is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths

(0.551) pound per hour. The brazing equipment, cutting torches, soldering equipment, welding equipment, and trimmers, identified as insignificant activities, have a maximum process weight rate less than one hundred (100) pounds per hour. Therefore, the rate of emissions from each of these units shall not exceed 0.551 pounds per hour of particulate matter.

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

The reclaim extruder #530 is subject to this rule because the potential VOC emissions are greater than or equal to twenty-five (25) tons per year. Compliance with the 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) satisfies the requirements of 326 IAC 8-1-6.

326 IAC 8-3 (Organic Solvent Degreaser Operations)

The organic solvent degreasing operation is subject to 326 IAC 8-3-2 because it is an existing facility as of January 1, 1980, and is located at a source which has the potential to emit one hundred (100) tons or greater per year of VOC. The organic solvent degreasing operation is subject to 326 IAC 8-3-5 because it is located in Marion County, is an existing facility as of July 1, 1990, and the degreaser does not utilize a remote solvent reservoir.

The degreasing operation shall comply with the following requirements:

- (a) Pursuant to 326 IAC 8-3-2, the owner or operator shall:
 - (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements; and
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one hand if:
 - (A) The solvent volatility is greater than three-tenths (0.3) pounds per square inch (15 millimeters of mercury) measured at thirty-eight degrees Celsius (38°C) (100 degrees Fahrenheit);
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility

- may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5(b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

The Permittee shall conduct a performance test to verify VOC control efficiency, as per condition D.1.1(b), for the "Reclaim Flash" incinerator utilizing methods as approved by the Commissioner. This test shall determine a minimum operating temperature to achieve 90% VOC control. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The extrusion foam, trim scrap grinding, and fluff conveying processes (emission units #4, 5, 9, 10, 16, 17, 18, 19, 20, and 21) have applicable compliance monitoring conditions as specified below:

- (a) Visible Emissions Notations

- (1) Visible emission notations of the extrusion foam, trim scrap grinding, and fluff conveying processes (emission units #4, 5, 9, 10, 16, 17, 18, 19, 20, and 21) cyclones shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (5) The Permittee shall include in its daily record when a visible emissions notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).
 - (6) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring requirements are necessary because the cyclones must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

2. The reclaim extrusion "Reclaim Flash" incinerator has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record the "Reclaim Flash" temperature continuously whenever the "Reclaim Flash" is in operation, and maintain the minimum operating temperature of the exhaust from the "Reclaim Flash" incinerator determined in the most recent compliance stack test to maintain at least 90% overall destruction of the VOC captured.

This monitoring condition is necessary because the "Reclaim Flash" incinerator for the reclaim extruders must operate properly to ensure compliance with 326 IAC 8-1-6 (New facilities: general reduction requirements) and 326 IAC 2-2 (PSD).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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 December 21, 2009. Additional information was received on January 25, 2010 and April 22, 2010.

Conclusion

The operation of this stationary plastic extrusion and thermoforming facility producing polystyrene extruded foam products shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T097-28770-00093.

Appendix A: Emissions Calculations
Particulate Emissions from PLA Agglomerator (EU #19) and
PLA Fluff Conveying (EU #20, #21)

Company Name: Cryovac Rigid Packaging, Sealed Air Corp.
Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: T097-28770-00093
Permit Reviewer: Donald McQuigg
Date: April 15, 2010

Fluff Conveying Systems Capacity, (lb/hr)	Emission Factor ⁽¹⁾ (lb PM/lb extruded)	Percent of PM that is PM10	Cyclone Control Efficiency
2000	8.86E-05	56.60%	95%

PM Calculations

Uncontrolled Emissions				Controlled Emissions			
Fluff Silo/conveying		Agglomerator		Silo		Agglomerator	
(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
1.77E-01	7.76E-01	8.86E-02	3.88E-01	8.86E-03	3.88E-02	4.43E-03	1.94E-02
Total:			1.1642	Total:			0.0582

PM10 Calculations

Uncontrolled Emissions				Controlled Emissions			
Fluff Silo/conveying		Agglomerator		Silo		Agglomerator	
(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
1.00E-01	4.39E-01	5.01E-02	2.20E-01	5.01E-03	2.20E-02	2.51E-03	1.10E-02
Total:			0.6589	Total:			0.0329

(1) Emission factor is based on emission rate confirmed by Stack Test performed on March 25, 2004.

PM Emissions (lb/hr) = Emission Factor (lb/lb) x Throughput (lb/hr)

PM Emissions (tons/yr) = PM Emissions (lb/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

Controlled Emissions = Uncontrolled Emissions x (1 - Control Efficiency)

PM10 Emissions = PM Emissions x Percent of PM that is PM10 (%)

Appendix A: Emissions Calculations
Particulate Emissions from Polystyrene Foam Extrusion
Grinders (EU #4 & #5), Fluff Conveying (EU #10, #18), Reclaim
Extruders (EU #11, #15), Scrap and Underpress grinders (EU #9, #16, #17)

Company Name: Cryovac Rigid Packaging, Sealed Air Corp.

Address: 7950 N. Allison Avenue, Indianapolis, Indiana 46268

Part 70 Permit No.: T097-28770-00093

Permit Reviewer: Donald McQuigg

Date: April 15, 2010

Total Extruder Throughput, (lb/hr)	Emission Factor⁽¹⁾ (lb PM/lb extruded)	Percent of PM that is PM10
6200	8.84E-06	56.60%

PM Calculations

Uncontrolled Emissions	
(lb/hr)	(ton/yr)
5.48E-02	2.40E-01
Total PM:	2.40E-01

PM10 Calculations

Uncontrolled Emissions	
(lb/hr)	(ton/yr)
3.10E-02	1.36E-01
Total PM10:	1.36E-01

(1) Emission factor is based on emission rate confirmed by Stack Testing performed on March 25, 2004.

Methodology:

PM Emissions (lb/hr) = Emission Factor (lb/lb) x Throughput (lb/hr)

PM Emissions (tons/yr) = PM Emissions (lb/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

PM10 Emissions = PM Emissions x Percent of PM that is PM10 (%)

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

Company Name: Cryovac Rigid Packaging, Sealed Air Corp.
Address City IN Zip: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: T097-28770-00093
Reviewer: Donald McQuigg
Date: April 15, 2010

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.4

38.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.9	0.1	1.6

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 4 for HAPs emissions calculations.

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

Company Name: Cryovac Rigid Packaging, Sealed Air Corp.
Address City IN Zip: 7950 N. Allison Avenue, Indianapolis, Indiana 46268
Part 70 Permit No.: T097-28770-00093
Reviewer: Donald McQuigg
Date: April 15, 2010

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.047E-05	2.313E-05	1.445E-03	3.469E-02	6.552E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.636E-06	2.120E-05	2.698E-05	7.323E-06	4.047E-05

Methodology is the same as page 3.

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Brian Hollies
Cryovac Rigid Packaging
7950 N Allison Ave
Indianapolis, IN 46268-1612

DATE: August 25, 2010

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

SUBJECT: Final Decision
Title V - Renewal
097 - 28770 - 00093

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:
Ernest R Vicars, Plant Mgr
David Jordan Environmental Resources Management (ERM)
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Toll Free (800) 451-6027
www.idem.IN.gov

August 25, 2010

TO: Pike Branch library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Cryovac Rigid Packaging
Permit Number: 097 - 28770 - 00093

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	LPOGOST 8/25/2010 Crvovac Rigid Packaging, Sealed Air Corporation 097 - 28770 - 00093 final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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1		Brian Hollies Crvovac Rigid Packaging, Sealed Air Corporation 7950 N Allison Ave Indianapolis IN 46268-1612 (Source CAATS) Via confirmed delivery										
2		Ernest R Vicars Plant Mgr Crvovac Rigid Packaging, Sealed Air Corporation 7950 N Allison Ave Indianapolis IN 46268-1612 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
6		Lawrence City Council and Mayors Office 9001 East 59th Street #205 Lawrence IN 46216 (Local Official)										
7		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
8		David Jordan Environmental Resources Management (ERM) 11350 North Meridian, Ste. 220 Carmel IN 46032 (Consultant)										
9		Pike Branch library 6525 Zionsville Road Indianapolis IN 46268 (Library)										
10		Ms. Jodi Perras Improving Kids Environment 1111 East 54th Street, Suite 212 Indianapolis IN 46220 (Affected Party)										
11		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
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