



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 5, 2010

RE: PolyOne Corporation / 167-28773-00075

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**PolyOne Corporation
3100 North 35th Street
Terre Haute, Indiana 47804**

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

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

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

Operation Permit No.: 167-28773-00075	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 5, 2010 Expiration Date: May 5, 2020

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary PVC compound production operation.

Source Address:	3100 North 35th Street, Terre Haute, Indiana 47804
Mailing Address:	3100 North 35th Street, Terre Haute, IN 47804
General Source Phone Number:	(812) 460-5334
SIC Code:	3087
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Four (4) PVC resin storage silos, identified as TK-1B – 4B, constructed in 1988 with a maximum storage capacity of 152,000 pounds, loaded via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 1 - 4.
- (b) Four (4) PVC resin storage silos, identified as TK-5B – 8B, constructed in 1982 with a maximum storage capacity of 200,000 pounds, loaded via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 5 - 8.
- (c) One (1) Calcium Carbonate (CaCO₃) storage silo, identified as TK-9B, constructed in 1988 with a maximum storage capacity of 120,000 pounds, loaded via pneumatic conveying system including an integral bin filter, utilizing no additional control and exhausting to stack 9.
- (d) One (1) closed loop Calcium Carbonate (CaCO₃) transfer system, identified as BL-7B, constructed in 1988 with a maximum capacity of 590 cfm.
- (e) Three (3) railcar unloading blowers, identified as BL-2B, BL-4B, and BL-6B, constructed in 1990 with maximum flow rates of 680 cfm, 1,000 cfm, and 1,300 cfm respectively, loaded via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 11 - 13.
- (f) Four (4) PVC resin transfer blower lines E, H, F, and C, identified as BL- 8B – 11B, constructed in 1990 with maximum flow rates of 1,100 cfm, 1,100 cfm, 1,100 cfm, and 720 cfm respectively, transferred via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 14 - 19.
- (g) Two (2) filter receivers for master batch material, identified as BL-4C and BL-4D, constructed in 1990 each with a maximum flow rate of 190 cfm, loaded and transferred

via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 21 - 22.

- (h) One (1) dryblend transfer system, identified as BL-1D, constructed in 1984 with a maximum flow rate of 600 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 23.
- (i) One (1) central dust collection system, identified as BL-CDC, constructed in 1987 with a maximum flow rate of 16,000 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 25.
- (j) Two (2) powder vacuum systems, identified as BL-2U and BL-3U, constructed in 1984 each with a maximum flow rate of 600 cfm, loaded via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 26 - 27.
- (k) Six (6) pellet transfer systems, identified as BL-5C – 5H, constructed in 1990 each with a maximum flow rate of 4,000 cfm, transferred via pneumatic conveying system including integral doghouses, utilizing no additional control and exhausting to stacks 29, 31, 33, 35, 37, and 39.
- (l) Six (6) pellet cooling systems, identified as BL-6C – 6H, constructed in 1990 each with a maximum flow rate of 13,000 cfm, cooled via pneumatic conveying system including integral doghouses, utilizing no additional control and exhausting to stacks 30, 32, 34, 36, 38, and 40.
- (m) Nine (9) liquid storage tanks, identified as TK-5A – 11A and TK-15A – 16A, constructed in 1988 with maximum storage capacities of 27,000 gallons, 28,000 gallons, 23,500 gallons, 41,800 gallons, 28,500 gallons, 85,500 gallons, 78,000 gallons, 40,500 gallons, and 40,000 gallons respectively.
- (n) One (1) PVC resin storage silo, identified as TK-10B, constructed in 1994 with a maximum capacity of 60,000 pounds, loaded via pneumatic conveying system including an integral bin filter, utilizing no additional control and exhausting to stack 10.
- (o) One (1) PVC resin transfer blower – line D, identified as BL-12B, constructed in 1994 with a maximum capacity of 1,100 cfm, transferred via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 15.
- (p) One (1) PVC resin transfer blower – line G, identified as BL-13B, constructed in 1994 with a maximum capacity of 1,100 cfm, transferred via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 18.
- (q) One (1) packaging vacuum system, identified as BL-4U, constructed in 1994 with a maximum capacity of 600 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 57.
- (r) Three (3) pellet silo transfer blowers, identified as TK-3P, TK-4P, and TK-5P, constructed in 1994 each with a maximum capacity of 600 cfm, transferred via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 43, 55, and 56.
- (s) One (1) PVC resin storage silo, identified as SED20B, approved for construction in 2010 with a maximum capacity of 10,000 pounds, loaded via pneumatic conveying system including an integral bin filter, and exhausting to stack SED20B.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, 167-28773-00075, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [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

- (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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 167-28773-00075 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
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 one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

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

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

C.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).

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.

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

C.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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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 2-6.1-5(a)(2)]

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

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

C.10 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

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.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.

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

C.13 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Four (4) PVC resin storage silos, identified as TK-1B – 4B, constructed in 1988 with a maximum storage capacity of 152,000 pounds, loaded via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 1 - 4.
- (b) Four (4) PVC resin storage silos, identified as TK-5B – 8B, constructed in 1982 with a maximum storage capacity of 200,000 pounds, loaded via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 5 - 8.
- (c) One (1) Calcium Carbonate (CaCO_3) storage silo, identified as TK-9B, constructed in 1988 with a maximum storage capacity of 120,000 pounds, loaded via pneumatic conveying system including an integral bin filter, utilizing no additional control and exhausting to stack 9.
- (d) One (1) closed loop Calcium Carbonate (CaCO_3) transfer system, identified as BL-7B, constructed in 1988 with a maximum capacity of 590 cfm.
- (e) Three (3) railcar unloading blowers, identified as BL-2B, BL-4B, and BL-6B, constructed in 1990 with maximum flow rates of 680 cfm, 1,000 cfm, and 1,300 cfm respectively, loaded via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 11 - 13.
- (f) Four (4) PVC resin transfer blower lines E, H, F, and C, identified as BL- 8B – 11B, constructed in 1990 with maximum flow rates of 1,100 cfm, 1,100 cfm, 1,100 cfm, and 720 cfm respectively, transferred via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 14 - 19.
- (g) Two (2) filter receivers for master batch material, identified as BL-4C and BL-4D, constructed in 1990 each with a maximum flow rate of 190 cfm, loaded and transferred via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 21 - 22.
- (h) One (1) dryblend transfer system, identified as BL-1D, constructed in 1984 with a maximum flow rate of 600 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 23.
- (i) One (1) central dust collection system, identified as BL-CDC, constructed in 1987 with a maximum flow rate of 16,000 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 25.
- (j) Two (2) powder vacuum systems, identified as BL-2U and BL-3U, constructed in 1984 each with a maximum flow rate of 600 cfm, loaded via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 26 - 27.
- (k) Six (6) pellet transfer systems, identified as BL-5C – 5H, constructed in 1990 each with a maximum flow rate of 4,000 cfm, transferred via pneumatic conveying system including integral doghouses, utilizing no additional control and exhausting to stacks 29, 31, 33, 35, 37, and 39.
- (l) Six (6) pellet cooling systems, identified as BL-6C – 6H, constructed in 1990 each with a maximum flow rate of 13,000 cfm, cooled via pneumatic conveying system including integral doghouses, utilizing no additional control and exhausting to stacks 30, 32, 34, 36, 38, and 40.

- (m) Nine (9) liquid storage tanks, identified as TK-5A – 11A and TK-15A – 16A, constructed in 1988 with maximum storage capacities of 27,000 gallons, 28,000 gallons, 23,500 gallons, 41,800 gallons, 28,500 gallons, 85,500 gallons, 78,000 gallons, 40,500 gallons, and 40,000 gallons respectively.
- (n) One (1) PVC resin storage silo, identified as TK-10B, constructed in 1994 with a maximum capacity of 60,000 pounds, loaded via pneumatic conveying system including an integral bin filter, utilizing no additional control and exhausting to stack 10.
- (o) One (1) PVC resin transfer blower – line D, identified as BL-12B, constructed in 1994 with a maximum capacity of 1,100 cfm, transferred via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 15.
- (p) One (1) PVC resin transfer blower – line G, identified as BL-13B, constructed in 1994 with a maximum capacity of 1,100 cfm, transferred via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 18.
- (q) One (1) packaging vacuum system, identified as BL-4U, constructed in 1994 with a maximum capacity of 600 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 57.
- (r) Three (3) pellet silo transfer blowers, identified as TK-3P, TK-4P, and TK-5P, constructed in 1994 each with a maximum capacity of 600 cfm, transferred via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 43, 55, and 56.
- (s) One (1) PVC resin storage silo, identified as SED20B, approved for construction in 2010 with a maximum capacity of 10,000 pounds, loaded via pneumatic conveying system including an integral bin filter, and exhausting to stack SED20B.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emission rate from the processes listed in the table below shall be limited by the following:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)	Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
TK-1B	10	19.18	BL-3U	30	40.04
TK-2B	10	19.18	BL-5C	5	12.05
TK-3B	10	19.18	BL-5D	5	12.05
TK-4B	10	19.18	BL-5E	5	12.05
TK-5B	10	19.18	BL-5F	5	12.05
TK-6B	10	19.18	BL-5G	5	12.05
TK-7B	10	19.18	BL-5H	5	12.05
TK-8B	10	19.18	BL-6C	5	12.05
TK-9B	10	19.18	BL-6D	5	12.05

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)	Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
BL-2B	62.5	65.47	BL-6E	5	12.05
BL-4B	62.5	65.47	BL-6F	5	12.05
BL-6B	62.5	65.47	BL-6G	5	12.05
BL-8B	12.5	22.27	BL-6H	5	12.05
BL-9B	12.5	22.27	TK-10B	10	19.18
BL-10B	12.5	22.27	BL-12B	12.5	22.27
BL-11B	12.5	22.27	BL-13B	12.5	22.27
BL-4C	5	12.05	BL-4U	30	40.04
BL-4D	5	12.05	TK-3P	5	12.05
BL-1D	26	36.38	TK-4P	5	12.05
BL-CDC	34	43.54	TK-5P	5	12.05
BL-2U	30	40.04	SED20B	5	12.05

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

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

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

The integral bin filters, baghouses, and doghouses shall be in operation at all times the facility is in operation, in order to comply with these limits.

D.1.2 Particulate [326 IAC 6.5-1-1]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter from: **TK-1B, TK-2B, TK-3B, TK-4B, TK-5B, TK-6B, TK-7B, TK-8B, TK-9B, BL-2B, BL-4B, BL-6B, BL-11B, BL-8B, BL-10B, BL-9B, BL-4C, BL-4D, BL-1D, BL-CDC, BL-2U, BL-3U, BL-5C, BL-6C, BL-5D, BL-6D, BL-5E, BL-6E, BL-5F, BL-6F, BL-5G, BL-6G, BL-5H, BL-6H, BL-4U, TK-10B, BL-12B, BL-13B, TK-3P, TK-4P, TK-5P,** and SED20B shall not exceed 0.03 grain per dry standard cubic foot (dscf).

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the records required by this condition, is required for this facility and its control devices.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with D.1.1, the integral bin filters, baghouses, and doghouses for particulate control shall be in operation and control emissions from the facility at all times that the facility is in operation.

D.1.5 Testing Requirements [326 IAC 2-6.1-5(b)(2)] [326 IAC 2-1.1-11]

Pursuant to Air-014-NPD and 326 IAC 2-6.1, the Permittee shall perform a one-time performance test, after the integral baghouse to verify the minor source status of the source when operating BL-CDC no later than 180 days after issuance of this Minor Source Operating Permit Renewal No.: 167-28773-00075, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the integral bin filter, baghouse, and doghouse exhausts (TK-1B, TK-2B, TK-3B, TK-4B, TK-5B, TK-6B, TK-7B, TK-8B, TK-9B, BL-2B, BL-4B, BL-6B, BL-11B, BL-8B, BL-10B, BL-9B, BL-4C, BL-4D, BL-1D, BL-CDC, BL-2U, BL-3U, BL-5C, BL-6C, BL-5D, BL-6D, BL-5E, BL-6E, BL-5F, BL-6F, BL-5G, BL-6G, BL-5H, BL-6H, BL-4U, TK-10B, BL-12B, BL-13B, TK-3P, TK-4P, TK-5P and SED20B) shall be performed weekly 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps, Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Failure to take response steps, Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition, shall be considered a deviation from this permit.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has 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. Failure to take response steps, Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition, shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the integral bin filter, baghouse, and doghouse exhausts weekly. The Permittee shall include in its weekly 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).

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	PolyOne Corporation
Address:	3100 North 35th Street
City:	Terre Haute, Indiana 47804
Phone #:	(812) 460-5334
MSOP #:	167-28773-00075

I hereby certify that PolyOne Corporation is :

still in operation.

no longer in operation.

I hereby certify that PolyOne Corporation is :

in compliance with the requirements of MSOP 167-28773-00075.

not in compliance with the requirements of MSOP 167-28773-00075.

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

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

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Addendum to the Technical Support Document (ATSD) for a
Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	PolyOne Corp.
Source Location:	3100 N. 25th Street, Terre Haute, IN 47804
County:	Vigo
SIC Code:	3087
Permit Renewal No.:	167-28773-00075
Permit Reviewer:	Bruce Farrar

On March 30, 2010, the Office of Air Quality (OAQ) had a notice published in Tribune Star, Terre Haute, Indiana, stating that PolyOne Corp. had applied for a Minor Source Operating Permit Renewal to operate a PVC compound production operation. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On April 13, 2010, August Mack Environmental, Inc. submitted comments to IDEM, OAQ on the draft Minor Source Operating Permit Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Condition D.1.8 - Please revise this condition to read as follows:

"To document compliance with Condition D.1.6, the permittee shall maintain records of visible emission notations of the integral bin filter, baghouse, and doghouse exhausts **weekly**."

Response to Comment 1:

IDEM agrees with the recommended changes. The permit has been revised as follows:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the integral bin filter, baghouse, and doghouse exhausts ~~daily~~ **weekly**. The Permittee shall include in its weekly 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).

Comment 2:

Condition C.12 has changed from the applicant draft. The response actions times have changed.

Response to Comment 2:

IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test (Condition C.12). The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe. No changes were made as a result of this comment.

Comment 3:

All references to "responsible official" have been removed throughout the permit.

Response to Comment 3:

IDEM, OLC has determined that IDEM can not require a certification in an MSOP. Therefore, we have removed the certification condition and any references in the permit (for example: "The submittal by the Permittee does (does not) require the certification to it). Credible evidence and Asbestos abatement talk about certifications. Therefore, they are allowed to stay because their rule make reference to a "certifying official".

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

1. For clarity, IDEM has changed references to the general conditions: "*in accordance with Section B*", "*in accordance with Section C*", or other similar language, to "Section C ... *contains the Permittee's obligations with regard to the records required by this condition.*"
2. IDEM has decided that the phrases "*no later than*" and "*not later than*" are clearer than "*within*" in relation to the end of a timeline. Therefore all timeline have been switched to "*no later than*" or "*not later than*".
3. IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) ***

The Permittee shall implement the PMPs.

(b) ***

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ **contains the Permittee's obligations with regard to the records required by this condition,** is required for this facility and its control devices

D.1.5 Testing Requirements [326 IAC 2-6.1-5(b)(2)] [326 IAC 2-1.1-11]

Pursuant to Air-014-NPD and 326 IAC 2-6.1, the Permittee shall perform a one-time performance test, after the integral baghouse to verify the minor source status of the source when operating BL-CDC ~~within~~ **no later than** 180 days after issuance of this Minor Source Operating Permit Renewal No.: 167-28773-00075, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the integral bin filter, baghouse, and doghouse exhausts (TK-1B, TK-2B, TK-3B, TK-4B, TK-5B, TK-6B, TK-7B, TK-8B, TK-9B, BL-2B, BL-4B, BL-6B, BL-11B, BL-8B, BL-10B, BL-9B, BL-4C, BL-4D, BL-1D, BL-CDC, BL-2U, BL-3U, BL-5C, BL-6C, BL-5D, BL-6D, BL-5E, BL-6E, BL-5F, BL-6F, BL-5G, BL-6G, BL-5H, BL-6H, BL-4U, TK-10B, BL-12B, BL-13B, TK-3P, TK-4P, TK-5P and SED20B) shall be performed weekly 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps ~~in accordance with~~, Section C - Response to Excursions or Exceedances **contains the Permittee's obligations with regard to the records required by this condition.** Failure to take response steps shall be considered a deviation from this permit. ~~in accordance with~~, Section C - Response to Excursions or Exceedances **contains the Permittee's obligations with regard to the records required by this condition.**

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Failure to take response steps ~~in accordance with~~, Section C - Response to Excursions or Exceedances **contains the Permittee's obligations with regard to the records required by this condition**, shall be considered a deviation from this permit.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has 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. Failure to take response steps ~~in accordance with~~, Section C - Response to Excursions or Exceedances **contains the Permittee's obligations with regard to the records required by this condition**, shall be considered a deviation from this permit.

IDEM Contact

- (a) Questions regarding this proposed Minor Source Operating Permit Renewal can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	PolyOne Corp.
Source Location:	3100 N. 25th Street, Terre Haute, IN 47804
County:	Vigo
SIC Code:	3087
Permit Renewal No.:	167-28773-00075
Permit Reviewer:	Bruce Farrar

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from PolyOne Corp. relating to the operation of a PVC compound production operation.

History

On December 21, 2009, PolyOne Corp. submitted an application to the OAQ requesting to renew its operating permit. PolyOne Corp. was issued a Minor Source Operating Permit on June 24, 2005.

Permitted Emission Units and Pollution Control Equipment

- (a) Four (4) PVC resin storage silos, identified as TK-1B – 4B, constructed in 1988 with a maximum storage capacity of 152,000 pounds, loaded via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 1 - 4.
- (b) Four (4) PVC resin storage silos, identified as TK-5B – 8B, constructed in 1982 with a maximum storage capacity of 200,000 pounds, loaded via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 5 - 8.
- (c) One (1) Calcium Carbonate (CaCO₃) storage silo, identified as TK-9B, constructed in 1988 with a maximum storage capacity of 120,000 pounds, loaded via pneumatic conveying system including an integral bin filter, utilizing no additional control and exhausting to stack 9.
- (d) One (1) closed loop Calcium Carbonate (CaCO₃) transfer system, identified as BL-7B, constructed in 1988 with a maximum capacity of 590 cfm.
- (e) Three (3) railcar unloading blowers, identified as BL-2B, BL-4B, and BL-6B, constructed in 1990 with maximum flow rates of 680 cfm, 1,000 cfm, and 1,300 cfm respectively, loaded via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 11 - 13.
- (f) Four (4) PVC resin transfer blower lines E, H, F, and C, identified as BL- 8B – 11B, constructed in 1990 with maximum flow rates of 1,100 cfm, 1,100 cfm, 1,100 cfm, and 720 cfm respectively, transferred via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 14 - 19.
- (g) Two (2) filter receivers for master batch material, identified as BL-4C and BL-4D, constructed in 1990 each with a maximum flow rate of 190 cfm, loaded and transferred via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 21-22.

- (h) One (1) dryblend transfer system, identified as BL-1D, constructed in 1984 with a maximum flow rate of 600 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 23.
- (i) One (1) central dust collection system, identified as BL-CDC, constructed in 1987 with a maximum flow rate of 16,000 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 25.
- (j) Two (2) powder vacuum systems, identified as BL-2U and BL-3U, constructed in 1984 each with a maximum flow rate of 600 cfm, loaded via pneumatic conveying system including integral baghouses, utilizing no additional control and exhausting to stacks 26 - 27.
- (k) Six (6) pellet transfer systems, identified as BL-5C – 5H, constructed in 1990 each with a maximum flow rate of 4,000 cfm, transferred via pneumatic conveying system including integral doghouses, utilizing no additional control and exhausting to stacks 29, 31, 33, 35, 37, and 39.
- (l) Six (6) pellet cooling systems, identified as BL-6C – 6H, constructed in 1990 each with a maximum flow rate of 13,000 cfm, cooled via pneumatic conveying system including integral doghouses, utilizing no additional control and exhausting to stacks 30, 32, 34, 36, 38, and 40.
- (m) Nine (9) liquid storage tanks, identified as TK-5A – 11A and TK-15A – 16A, constructed in 1988 with maximum storage capacities of 27,000 gallons, 28,000 gallons, 23,500 gallons, 41,800 gallons, 28,500 gallons, 85,500 gallons, 78,000 gallons, 40,500 gallons, and 40,000 gallons respectively.
- (n) One (1) PVC resin storage silo, identified as TK-10B, constructed in 1994 with a maximum capacity of 60,000 pounds, loaded via pneumatic conveying system including an integral bin filter, utilizing no additional control and exhausting to stack 10.
- (o) One (1) PVC resin transfer blower – line D, identified as BL-12B, constructed in 1994 with a maximum capacity of 1,100 cfm, transferred via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 15.
- (p) One (1) PVC resin transfer blower – line G, identified as BL-13B, constructed in 1994 with a maximum capacity of 1,100 cfm, transferred via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 18.
- (q) One (1) packaging vacuum system, identified as BL-4U, constructed in 1994 with a maximum capacity of 600 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 57.
- (r) Three (3) pellet silo transfer blowers, identified as TK-3P, TK-4P, and TK-5P, constructed in 1994 each with a maximum capacity of 600 cfm, transferred via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 43, 55, and 56.

Emission Units and Pollution Control Equipment Constructed

The following is a list of the new emission unit and pollution control device:

- (a) One (1) PVC resin storage silo, identified as SED20B, approved for construction in 2010 with a maximum capacity of 10,000 pounds, loaded via pneumatic conveying system including an integral bin filter, and exhausting to stack SED20B.

Emission Units and Pollution Control Equipment Removed From the Source

- (a) Two (2) pellet silo transfer blowers, identified as TK-1P and TK-2P, constructed in 1984 each with a maximum flow rate of 600 cfm, loaded via pneumatic conveying system including integral bin filters, utilizing no additional control and exhausting to stacks 41 - 42.
- (b) One (1) bin 3 bagger, identified as B-3, constructed in 1994 with a maximum capacity of 2,000 cfm, loaded via pneumatic conveying system including an integral baghouse, utilizing no additional control and exhausting to stack 58.

Existing Approvals

There have been no other approvals since the issuance of the MSOP 167-17687-00075 on June 24, 2005.

All terms and conditions of the previous permit 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.

Air Pollution Control Justification as an Integral Part of the Process

The new PVC resin storage silo, identified as SED20B, approved for construction in 2010, is an integral part of the material handling, transfer and cooling processes because it is similar to the PVC resin storage silo, identified as TK-10B. The determination for the PVC resin storage silo, identified as TK-10B as integral was made pursuant to MSOP No.: 167-17687-00075, issued on June 24, 2005.

The source submitted the following justification that the bin filters, baghouses, and doghouses be considered as an integral part of the material handling, transfer, and cooling processes:

- (a) The bin filters, baghouses, and doghouses are entirely used for product recovery during the manufacturing process. The fabric filters are used to separate the polymer from the air stream and drop it into the next stage of the process. This equipment was not installed to control air pollution and would have been installed even if no air quality regulations were in place.
- (b) The production processes could not work without the fabric filters in place and functioning properly. Should one of these devices fail, that section or line of the production process would need to be shut down until the failure has been corrected otherwise product would be emitted on to the roof of the production plant where it would be lost.
- (c) The bin filters, baghouses, and doghouses are not the "add-on" type of control equipment. The source's potential emissions definition conforms to that described in 326 IAC 1-2-55.

IDEM, OAQ evaluated the justifications and agreed that the bin filters, baghouses, and doghouses be considered as an integral part of the material handling, transfer, and cooling processes. Therefore, MSOP No.: 167-17687-00075, issued on June 24, 2005, the permitting level was determined using the potential to emit after the bin filters, baghouses, and doghouses. Operating conditions in the proposed permit will specify that the bin filters, baghouses, and doghouses shall operate at all times when the material handling, transfer, and cooling processes are in operation.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

County Attainment Status

The source is located in Vigo County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Vigo County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

- (c) **Other Criteria Pollutants**
 Vigo County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	26.39
PM ₁₀ ⁽¹⁾	26.39
PM _{2.5}	26.39
SO ₂	0.00
VOC	0.00
CO	0.00
NO _x	0.00

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

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

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
TK-1B	0.44	0.44	0.44	-	-	-	-	-	-
TK-2B	0.44	0.44	0.44	-	-	-	-	-	-
TK-3B	0.44	0.44	0.44	-	-	-	-	-	-
TK-4B	0.44	0.44	0.44	-	-	-	-	-	-
TK-5B	0.44	0.44	0.44	-	-	-	-	-	-
TK-6B	0.44	0.44	0.44	-	-	-	-	-	-
TK-7B	0.44	0.44	0.44	-	-	-	-	-	-
TK-8B	0.44	0.44	0.44	-	-	-	-	-	-
TK-9B	0.44	0.44	0.44	-	-	-	-	-	-
BL-2B	2.74	2.74	2.74	-	-	-	-	-	-
BL-4B	2.74	2.74	2.74	-	-	-	-	-	-
BL-6B	2.74	2.74	2.74	-	-	-	-	-	-
BL-8B	0.55	0.55	0.55	-	-	-	-	-	-
BL-9B	0.55	0.55	0.55	-	-	-	-	-	-
BL-10B	0.55	0.55	0.55	-	-	-	-	-	-
BL-11B	0.55	0.55	0.55	-	-	-	-	-	-

Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
BL-4C	0.22	0.22	0.22	-	-	-	-	-	-
BL-4D	0.22	0.22	0.22	-	-	-	-	-	-
BL-1D	1.14	1.14	1.14	-	-	-	-	-	-
BL-CDC	1.49	1.49	1.49	-	-	-	-	-	-
BL-2U	1.31	1.31	1.31	-	-	-	-	-	-
BL-3U	1.31	1.31	1.31	-	-	-	-	-	-
BL-5C	0.22	0.22	0.22	-	-	-	-	-	-
BL-5D	0.22	0.22	0.22	-	-	-	-	-	-
BL-5E	0.22	0.22	0.22	-	-	-	-	-	-
BL-5F	0.22	0.22	0.22	-	-	-	-	-	-
BL-5G	0.22	0.22	0.22	-	-	-	-	-	-
BL-5H	0.22	0.22	0.22	-	-	-	-	-	-
BL-6C	0.22	0.22	0.22	-	-	-	-	-	-
BL-6D	0.22	0.22	0.22	-	-	-	-	-	-
BL-6E	0.22	0.22	0.22	-	-	-	-	-	-
BL-6F	0.22	0.22	0.22	-	-	-	-	-	-
BL-6G	0.22	0.22	0.22	-	-	-	-	-	-
BL-6H	0.22	0.22	0.22	-	-	-	-	-	-
TK-10B	0.44	0.44	0.44	-	-	-	-	-	-
BL-12B	0.55	0.55	0.55	-	-	-	-	-	-
BL-13B	0.55	0.55	0.55	-	-	-	-	-	-
BL-4U	1.31	1.31	1.31	-	-	-	-	-	-
TK-3P	0.22	0.22	0.22	-	-	-	-	-	-
TK-4P	0.22	0.22	0.22	-	-	-	-	-	-
TK-5P	0.22	0.22	0.22	-	-	-	-	-	-
SED20B	0.22	0.22	0.22	-	-	-	-	-	-
Total PTE of Entire Source	26.39	26.39	26.39	-	-	-	-	-	-
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards (NSPS) for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry (40 CFR Part 60), Subpart DDD, do not apply, because the facility does not manufacture the listed polymers.
- (b) The requirements of the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR Part 60), Subpart Kb, are not included, because the liquid storage tanks do not contain VOCs.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standard for Vinyl Chloride, (40 CFR 61) Subpart F are not included in the permit because the source does not manufacture the listed products.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group I Polymers and Resins, (40 CFR 63) Subpart U are not included in the permit because the source does not have elastomer product process units (EPPU).
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standards for Tanks—Level 1, (40 CFR 63) Subpart OO are not included in the permit because the source is not a major source for HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group IV Polymers and Resins, (40 CFR 63) Subpart JJJ are not included in the permit because the source is not a major source for HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers Production Area Sources, (40 CFR 63) Subpart DDDDDD are not included in the permit because the source does not produce polyvinyl chloride (PVC) or copolymers.
- (i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
 The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
 This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

326 IAC 5-1 (Opacity Limitations)
 Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)	Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
TK-1B	10	19.18	BL-3U	30	40.04
TK-2B	10	19.18	BL-5C	5	12.05
TK-3B	10	19.18	BL-5D	5	12.05
TK-4B	10	19.18	BL-5E	5	12.05
TK-5B	10	19.18	BL-5F	5	12.05
TK-6B	10	19.18	BL-5G	5	12.05
TK-7B	10	19.18	BL-5H	5	12.05
TK-8B	10	19.18	BL-6C	5	12.05
TK-9B	10	19.18	BL-6D	5	12.05
BL-2B	62.5	65.47	BL-6E	5	12.05
BL-4B	62.5	65.47	BL-6F	5	12.05
BL-6B	62.5	65.47	BL-6G	5	12.05
BL-8B	12.5	22.27	BL-6H	5	12.05
BL-9B	12.5	22.27	TK-10B	10	19.18
BL-10B	12.5	22.27	BL-12B	12.5	22.27

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)	Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
BL-11B	12.5	22.27	BL-13B	12.5	22.27
BL-4C	5	12.05	BL-4U	30	40.04
BL-4D	5	12.05	TK-3P	5	12.05
BL-1D	26	36.38	TK-4P	5	12.05
BL-CDC	34	43.54	TK-5P	5	12.05
BL-2U	30	40.04	SED20B	5	12.05

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

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

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

The integral bin filters, baghouses, and doghouses shall be in operation at all times the facility is in operation, in order to comply with these limits.

326 IAC 6.5-9 (Particulate Matter Limitations Except Lake County)

The source is located in Vigo County, but is not specifically listed in 326 IAC 6.5-9. Pursuant to 326 IAC 6.5-1-1(a), the potential particulate emissions are less than one hundred (100) tons per year, however, the actual emissions are over ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) apply.

326 IAC 8-1-6 (New facilities; General Reduction Requirements)

The potential VOC emissions from this source are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

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

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

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

Compliance Determination and Monitoring Requirements

- (a) **The compliance determination and monitoring requirements applicable to this source are as follows:**

Emission Unit/Control	Operating Parameters	Frequency
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Emission Unit/Control	Operating Parameters	Frequency
bin filter, baghouse, and doghouse exhausts (TK-1B, TK-2B, TK-3B, TK-4B, TK-5B, TK-6B, TK-7B, TK-8B, TK-9B, BL-2B, BL-4B, BL-6B, BL-11B, BL-8B, BL-10B, BL-9B, BL-4C, BL-4D, BL-1D, BL-CDC, BL-2U, BL-3U, BL-5C, BL-6C, BL-5D, BL-6D, BL-5E, BL-6E, BL-5F, BL-6F, BL-5G, BL-6G, BL-5H, BL-6H, BL-4U, TK-10B, BL-12B, BL-13B, TK-3P, TK-4P, TK-5P, and SED20B)	visible emission	weekly normal daylight

These monitoring conditions are necessary because:

The bin filter, baghouse, and doghouse exhausts for TK-1B, TK-2B, TK-3B, TK-4B, TK-5B, TK-6B, TK-7B, TK-8B, TK-9B, BL-2B, BL-4B, BL-6B, BL-11B, BL-8B, BL-10B, BL-9B, BL-4C, BL-4D, BL-1D, BL-CDC, BL-2U, BL-3U, BL-5C, BL-6C, BL-5D, BL-6D, BL-5E, BL-6E, BL-5F, BL-6F, BL-5G, BL-6G, BL-5H, BL-6H, BL-4U, TK-10B, BL-12B, BL-13B, TK-3P, TK-4P, TK-5P, and SED20B must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-6.1 (MSOP) and 326 6.5-1-1 (Particulate Matter Limitations Except Lake County).

- (b) Pursuant to Air-014-NPD and 326 IAC 2-6.1, the Permittee shall perform a one-time performance test, after the integral baghouse to verify the minor source status of the source when operating BL-CDC within 180 days after issuance of this Minor Source Operating Permit Renewal No.: 167-28773-00075. This test is necessary because the emission factor used to calculate particulate emissions is not approved by U.S. EPA or IDEM, OAQ.

Recommendation

The staff recommends to the Commissioner that the MSOP 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.

Conclusion

The operation of this PVC compound production operation shall be subject to the conditions of the attached MSOP Renewal No. 167-28773-00075.

Appendix A: Emissions Calculations
Total Potential Emissions

Company Name: PolyOne Corp
Address City IN Zip: 3100 N. 35th Street, Terre Haute IN 47804
Permit Number: 167-28773-00075
Pit ID: 167-00075
Reviewer: Bruce Farrar
Date: December 21, 2009

Unit Identification	Pollutant						
	PM	PM10	PM2.5	SO2	NOx	VOC	CO
Polymer Handling System (Total of All Units)	26.39	26.39	26.39	0.00	0.00	0.00	0.00
TOTAL (tons per year)	26.39	26.39	26.39	0.00	0.00	0.00	0.00
TOTAL (pounds per hour)	6.03	6.03	6.03	0.00	0.00	0.00	0.00

**Appendix A: Emissions Calculations
Polymer Handling System**

Company Name: PolyOne Corp
Address City IN Zip: 3100 N. 35th Street, Terre Haute IN 47804
Permit Number: 167-28773-00075
Pit ID: 167-00075
Reviewer: Bruce Farrar
Date: December 21, 2009

Pursuant to Permit No.: 167-17687-00075, issued on June 24, 2005, the calculations are based on a study used for Applied Extrusion Technologies (AET) calculations. PolyOne Corp and AET are similar operations based on data gathered from AET the resin contains 1 lb dust per 1000 lb. This fraction dust will be used to determine what part of the polymer handled at each emission point is released, since the pneumatic conveying system will be able to collect virtually all of the pea sized resin pellets

0.001 Fraction of dust contained in the product as delivered by railcar

Emission Point Description	TK-1B PVC Resin Storage Silo	TK-2B PVC Resin Storage Silo	TK-3B PVC Resin Storage Silo	TK-4B PVC Resin Storage Silo	TK-5B PVC Resin Storage Silo	TK-6B PVC Resin Storage Silo	TK-7B PVC Resin Storage Silo	TK-8B PVC Resin Storage Silo
Gas Flow (ACFM)	590	590	590	590	590	590	590	590
Max Polymer (lb/hr)	20000	20000	20000	20000	20000	20000	20000	20000
Max Dust (lb/hr)	20	20	20	20	20	20	20	20
Removal Eff.	99.5	99.5	99.5	99.5	99.5	99.5	99.5	99.5
Max Emission (lb/hr)	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Grains/ACF	0.01977	0.01977	0.01977	0.01977	0.01977	0.01977	0.01977	0.01977

Emission Point Description	BL-2B Rail Car Unloading Blower	BL-4B Rail Car Unloading Blower	BL-6B Rail Car Unloading Blower	BL-8B PVC Resin Transfer Blower - Line E	BL-9B PVC Resin Transfer Blower - Line H	BL-10B PVC Resin Transfer Blower - Line F	BL-11B PVC Resin Transfer Blower - Line C
Gas Flow (ACFM)	680	1000	1300	1100	1100	1100	720
Max Polymer (lb/hr)	125000	125000	125000	25000	25000	25000	25000
Max Dust (lb/hr)	125	125	125	25	25	25	25
Removal Eff.	99.5	99.5	99.5	99.5	99.5	99.5	99.5
Max Emission (lb/hr)	0.625	0.625	0.625	0.125	0.125	0.125	0.125
Grains/ACF	0.10723	0.07292	0.05609	0.01326	0.01326	0.01326	0.02025

Methodology:

Hourly PM/PM10/PM2.5 emissions = $\frac{gr}{acft} * acf/min * 60 \text{ min}/1 \text{ hr} * 1 \text{ lb}/7000 \text{ gr} * (1 - 0.995 \text{ control efficiency})$
 Annual PM/PM10/PM2.5 emissions = $\text{hourly emissions} * 8760 \text{ hr}/1 \text{ yr} * 1 \text{ ton}/2000 \text{ lb}$
 Integral part of operation, all the dust collectors qualify as integral parts to include the polymer extrusion system.

**Appendix A: Emissions Calculations
Polymer Handling System**

Company Name: PolyOne Corp
Address City IN Zip: 3100 N. 35th Street, Terre Haute IN 47804
Permit Number: 167-28773-00075
Plt ID: 167-00075
Reviewer: Bruce Farrar
Date: December 21, 2009

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0.001 Fraction of dust contained in the product as delivered by railcar

Emission Point Description	BL-4C Filter Receivers Master Batch	BL-4D Filter Receivers Master Batch	BL-1D Dryblend Transfer System	BL-CDC Central Dust Collection	BL-2U Powder Vacuum System	BL-3U Powder Vacuum System	BL-5C Line C Pellet Transfer	BL-5D Line D Pellet Transfer
Gas Flow (ACFM)	190	190	600	16000	600	600	4000	4000
Max Polymer (lb/hr)	10000	10000	52000	68000	60000	60000	10000	10000
Max Dust (lb/hr)	10	10	52	68	60	60	10	10
Removal Eff.	99.5	99.5	99.5	99.5	99.5	99.5	99.5	99.5
Max Emission (lb/hr)	0.05	0.05	0.26	0.34	0.3	0.3	0.05	0.05
Grains/ACF	0.03070	0.03070	0.05056	0.00248	0.05833	0.05833	0.00146	0.00146

Emission Point Description	BL-5E Line E Pellet Transfer	BL-5F Line F Pellet Transfer	BL-5G Line G Pellet Transfer	BL-5H Line H Pellet Transfer	BL-6C Line C Pellet Cooling System	BL-6D Line D Pellet Cooling System	BL-6E Line E Pellet Cooling System	BL-6F Line F Pellet Cooling System
Gas Flow (ACFM)	4000	4000	4000	4000	13000	13000	13000	13000
Max Polymer (lb/hr)	10000	10000	10000	10000	10000	10000	10000	10000
Max Dust (lb/hr)	10	10	10	10	10	10	10	10
Removal Eff.	99.5	99.5	99.5	99.5	99.5	99.5	99.5	99.5
Max Emission (lb/hr)	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
Grains/ACF	0.00146	0.00146	0.00146	0.00146	0.00045	0.00045	0.00045	0.00045

Methodology:

Hourly PM/PM10/PM2.5 emissions = $\text{gr/acf} \times \text{acf/min} \times 60 \text{ min/hr} \times 1\text{lb}/7000\text{gr} \times (1 - 0.995 \text{ control efficiency})$
 Annual PM/PM10/PM2.5 emissions = $\text{hourly emissions} \times 8760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lb}$
 Integral part of operation, all the dust collectors qualify as integral parts to include the polymer extrusion system.

**Appendix A: Emissions Calculations
Polymer Handling System**

Company Name: PolyOne Corp
Address City IN Zip: 3100 N. 35th Street, Terre Haute IN 47804
Permit Number: 167-28773-00075
Pt ID: 167-00075
Reviewer: Bruce Farrar
Date: December 21, 2009

Pursuant to Permit No.: 167-17687-00075, issued on June 24, 2005, the calculations are based on a study used for Applied Extrusion Technologies (AET) calculations. PolyOne Corp and AET are similar operations based on data gathered from AET the resin contains 1 lb dust per 1000 lb. This fraction dust will be used to determine what part of the polymer handled at each emission point is released, since the pneumatic conveying system will be able to collect virtually all of the pea sized resin pellets

0.001 Fraction of dust contained in the product as delivered by railcar

Emission Point Description	BL-6G Line G Pellet Cooling System	BL-6H Line H Pellet Cooling System	TK-10B PVC Resin Storage Silo	BL-12B PVC Resin Transfer Blower - Line D	BL-13B PVC Resin Transfer Blower - Line C	BL-4U Packaging Vacuum System	TK-3P Pellet Silo Transfer Blower	TK-4P Pellet Silo Transfer Blower
Gas Flow (ACFM)	13000	13000	590	1100	1100	600	600	600
Max Polymer (lb/hr)	10000	10000	20000	25000	25000	60000	10000	10000
Max Dust (lb/hr)	10	10	20	25	25	60	10	10
Removal Eff.	99.5	99.5	99.5	99.5	99.5	99.5	99.5	99.5
Max Emission (lb/hr)	0.05	0.05	0.1	0.125	0.125	0.3	0.05	0.05
Grains/ACF	0.00045	0.00045	0.01977	0.01326	0.01326	0.05833	0.00972	0.00972

Emission Point Description	TK-5P Pellet Silo Transfer Blower	SED20B PVC Resin Storage Silo	After control emissions: total of all emission rates
Gas Flow (ACFM)	600	590	6.03 pounds per hour
Max Polymer (lb/hr)	10000	10000	26.39 tons per year
Max Dust (lb/hr)	10	10	
Removal Eff.	99.5	99.5	
Max Emission (lb/hr)	0.05	0.05	
Grains/ACF	0.00972	0.00989	

Methodology:

Hourly PM/PM10/PM2.5 emissions = gr/acf * acf/min * 60 min/1 hr * 1lb/7000gr * (1 - 0.995 control efficiency)
 Annual PM/PM10/PM2.5 emissions = hourly emissions * 8760 hr/1 yr * 1 ton/2000 lb
 Integral part of operation, all the dust collectors qualify as integral parts to include the polymer extrusion system.



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: Gerald Taney
PolyOne Corporation
3100 N 35th St
Terre Haute, IN 47804

DATE: May 5, 2010

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

SUBJECT: Final Decision
MSOP
167-28773-00075

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:
Michael Norris, Responsible Official
Brooke A Myer, Consultant
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

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May 5, 2010

TO: Vigo County Public Library

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

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

Applicant Name: PolyOne Corp
Permit Number: 167-28773-00075

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	DPABST 5/5/2010 PolyOne Corporation 167-28773-00075 (Final)		CERTIFICATE OF MAILING ONLY	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		

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1		Gerald Taney PolyOne Corporation 3100 N 35th St Terre Haute IN 47804 (Source CAATS) (CONFIRM DELIVERY)										
2		Michael Norris Plant Mgr PolyOne Corporation 3100 N 35th St Terre Haute IN 47804 (RO CAATS)										
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
4		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)										
5		Terre Haute City Council and Mayors Office 17 Harding Ave Terre Haute IN 47807 (Local Official)										
6		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)										
7		Vigo Co Public Library 1 Library Square Terre Haute IN 47807-3609 (Library)										
8		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)										
9		Deb Reeves Vigo County Air Pollution Control 121 Oak Terre Haute IN 47807 (Local Official)										
10		Brooke A. Myer August Mack Environmental, Inc. 1302 N. Meridian Street, Suite 300 Indianapolis IN 46202 (Consultant)										
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