



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: March 16, 2010

RE: The Dallas Group of America, Inc. / 019-28800-00050

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

**The Dallas Group of America, Inc.  
1402 Fabricon Blvd.  
Jeffersonville, Indiana 47130**

(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.: 019-28800-00050  |  |
| Issued by:<br><br>Iryn Calilung, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: March 16, 2010<br>Expiration Date: March 16, 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 synthetic magnesium silicate (Magnesol) manufacturing operation.

|                              |   |
|------------------------------|---|
| Source Address:              | 1402 Fabricon Blvd., Jeffersonville, Indiana 47130  |
| Mailing Address:             | 1402 Fabricon Blvd., Jeffersonville, IN 47130   |
| General Source Phone Number: | 812-283-6675  |
| SIC Code:                    | 2819  |
| County Location:             | Clark   |
| Source Location Status:      | Nonattainment for PM2.5 standard<br>Attainment for all other criteria pollutants  |
| Source Status:               | Minor Source Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) 7.5 MMBtu/hr natural gas fired dryer, identified as Dryer 1, that uses a slinging motion to dry slurry,
- (b) One (1) 15 MMBtu/hr natural gas fired dryer, identified as Dryer 2, , that uses a slinging motion to dry slurry, with a maximum capacity of 0.58 tons of slurry per hour ,with particulate emissions controlled by an integral baghouse product collector, PC-420, with emissions exhausted through Stack PC-420,
- (c) One (1) 40 MMBtu/hr natural gas fired dryer, identified as Dryer 3, that uses a slinging motion to dry slurry, with a maximum capacity of 1.60 tons of slurry per hour with particulate emissions controlled by an integral baghouse product collector, PC-480, with emissions exhausted through a heat recovery scrubber then through Stack PC-480,
- (d) One (1) 0.25 MMBtu/hr natural gas fired dryer, identified as Pilot Dryer, that uses a slinging motion to dry slurry,
- (e) One (1) spray dryer product collection system consisting of two (2) baghouses identified as PC-144 and PC-80,
- (f) One (1) product classifier, totally enclosed equipped with a maximum capacity of 1.60 tons per hour,
- (g) One (1) pneumatic product conveyor system with particulate emissions controlled by two baghouses, identified as PC-16 and PC-4,

- (h) One (1) pneumatic raw material recovery and conveyor system, with emissions collected by one of three baghouses; PC-4, PC-16, or PC-144,
- (i) One (1) 4.185 MMBtu/hr natural gas fired boiler, with emissions exhausted through the boiler stack,
- (j) One (1) 3.8 MMBtu/hr natural gas fired water heater,
- (k) One (1) general nuisance dust collection baghouse, identified as PC-19,
- (l) Two (2) raw materials storage bins, identified as RMT 102 and RMT 103, and
- (m) Three (3) outdoor liquid raw materials storage bins.

## **SECTION B GENERAL CONDITIONS**

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

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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, 019-28800-00050, 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**

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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**

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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**

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

### **B.7 Duty to Provide Information**

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

**B.8 Certification**

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

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

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- (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, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.10 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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- (a) All terms and conditions of permits established prior to 019-28800-00050 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
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 in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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(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

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

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

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry**

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

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

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

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

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

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

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

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

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(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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

---

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

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

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

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

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

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

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

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

## **Corrective Actions and Response Steps**

### **C.13 Response to Excursions or Exceedances**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (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 maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

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

**C.15 Malfunctions Report [326 IAC 1-6-2]**

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

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

C.17 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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) 15 MMBtu/hr natural gas fired dryer, identified as Dryer 2, , that uses a slinging motion to dry slurry, with a maximum capacity of 0.58 tons of slurry per hour ,with particulate emissions controlled by an integral baghouse product collector, PC-420, with emissions exhausted through Stack PC-420,
- (c) One (1) 40 MMBtu/hr natural gas fired dryer, identified as Dryer 3, that uses a slinging motion to dry slurry, with a maximum capacity of 1.60 tons of slurry per hour with particulate emissions controlled by an integral baghouse product collector, PC-480, with emissions exhausted through a heat recovery scrubber then through Stack PC-480,

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

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

#### D.1.1 MSOP [326 IAC 2-6.1] [326 IAC 6-3-2]

Pursuant to 2-6.1-1, the integral baghouses, used for product collection, used in association with Dryer 2 and Dryer 3 must be in operation at all times when the associated dryer is in operation.

#### D.1.2 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for these facilities and any control devices.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.3 Visible Emissions Notations

- (a) Daily visible emissions notations of Stacks PC-420 and PC-480 shall be performed during normal daylight operations. 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 shutdown time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during the 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 purpose.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take reasonable steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation from this permit.

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain daily records

of visible emissions notations of Stacks PC-420 and PC-480 exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (i.e. 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.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (i) One (1) 4.185 MMBtu/hr natural gas fired boiler, with emissions exhausted through the boiler stack,

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

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

#### D.2.1 Particulate Emissions [326 IAC 6-2-4]

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Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 4.185 MMBtu/hr boiler shall not exceed 0.6 pounds per MMBtu heat input.

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

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

Source Name: The Dallas Group of America, Inc.  
Source Address: 1402 Fabricon Blvd., Jeffersonville, Indiana 47130  
Mailing Address: 1402 Fabricon Blvd., Jeffersonville, IN 47130  
MSOP No.: 019-28800-00050

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE 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).

|                      |                                   |
|----------------------|-----------------------------------|
| <b>Company Name:</b> | The Dallas Group of America, Inc. |
| <b>Address:</b>      | 1402 Fabricon Blvd.               |
| <b>City:</b>         | Jeffersonville, Indiana 47130     |
| <b>Phone #:</b>      | 812-283-6675                      |
| <b>MSOP #:</b>       | 019-28800-00050                   |

I hereby certify that The Dallas Group of America, Inc. is :  still in operation.  
 no longer in operation.  
I hereby certify that The Dallas Group of America, Inc. is :  in compliance with the requirements of MSOP 019-28800-00050.  
 not in compliance with the requirements of MSOP 019-28800-00050.

|                                       |
|---------------------------------------|
| <b>Authorized Individual (typed):</b> |
| <b>Title:</b>                         |
| <b>Signature:</b>                     |
| <b>Date:</b>                          |

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.

|                       |
|-----------------------|
| <b>Noncompliance:</b> |
|                       |
|                       |
|                       |
|                       |

### MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

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

**Source Background and Description**

|                            |  |
|----------------------------|--|
| <b>Source Name:</b>        | <b>The Dallas Group of America, Inc.</b>             |
| <b>Source Location:</b>    | <b>1402 Fabricon Blvd., Jeffersonville, IN 47130</b> |
| <b>County:</b>             | <b>Clark</b>   |
| <b>SIC Code:</b>           | <b>2819</b>  |
| <b>Permit Renewal No.:</b> | <b>019-28800-00050</b>                               |
| <b>Permit Reviewer:</b>    | <b>Jillian Bertram</b>                               |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from The Dallas Group of America, Inc. relating to the operation of a synthetic magnesium silicate (Magnesol) manufacturing operation. Magnesol is a product used in the food service industry to keep shortening clean and free from impurities, which reduces the build-up of off-flavor, off-odors and color in used shortening.

**History**

On November 23, 2009, The Dallas Group of America, Inc. submitted an application to the OAQ requesting to renew its operating permit. The Dallas Group of America, Inc. was issued a MSOP Renewal on July 10, 2003.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) 7.5 MMBtu/hr natural gas fired dryer, identified as Dryer 1, that uses a slinging motion to dry slurry,
- (b) One (1) 15 MMBtu/hr natural gas fired dryer, identified as Dryer 2, , that uses a slinging motion to dry slurry, with a maximum capacity of 0.58 tons of slurry per hour ,with particulate emissions controlled by an integral baghouse product collector, PC-420, with emissions exhausted through Stack PC-420,
- (c) One (1) 40 MMBtu/hr natural gas fired dryer, identified as Dryer 3, that uses a slinging motion to dry slurry, with a maximum capacity of 1.60 tons of slurry per hour with particulate emissions controlled by an integral baghouse product collector, PC-480, with emissions exhausted through a heat recovery scrubber then through Stack PC-480,
- (d) One (1) 0.25 MMBtu/hr natural gas fired dryer, identified as Pilot Dryer, that uses a slinging motion to dry slurry,
- (e) One (1) spray dryer product collection system consisting of two (2) baghouses identified as PC-144 and PC-80,
- (f) One (1) product classifier, totally enclosed, equipped with a maximum capacity of 1.60 tons per hour,
- (g) One (1) pneumatic product conveyor system with particulate emissions controlled by two baghouses, identified as PC-16 and PC-4,

- (h) One (1) pneumatic raw material recovery and conveyor system, with emissions collected by one of three baghouses; PC-4, PC-16, or PC-144,
- (i) One (1) 4.185 MMBtu/hr natural gas fired boiler, with emissions exhausted through the boiler stack,
- (j) One (1) 3.8 MMBtu/hr natural gas fired water heater,
- (k) One (1) general nuisance dust collection baghouse, identified as PC-19,
- (l) Two (2) raw materials storage bins, identified as RMT 102 and RMT 103, and
- (m) Three (3) outdoor liquid raw materials storage bins.

No emission units have been added or removed since issuance of the last approval.

### **Existing Approvals**

Since the issuance of MSOP (019-16580-00050) on July 10, 2003, the source has constructed or has been operating under Notice-only Change No. (019-19252-00050) issued on August 11, 2004.

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

### **Air Pollution Control Justification as an Integral Part of the Process**

On December 22, 2009, the applicant has submitted the following justification such that the baghouses (PC-480, PC-420, and PC-9) be considered as an integral part of the drying processes:

The primary purpose of these units is product collection. The finished product, which is collected in the baghouses, is sold. Each dryer line could not function without them. Approximately 99.5% of the material going to each baghouse is collected as finished product and sold to customers.

IDEM, OAQ has evaluated the justifications and agreed that the baghouses (PC-480 and PC-420) will be considered as an integral part of the drying processes. Therefore, the permitting level will be determined using the potential to emit after the baghouses. Operating conditions in the proposed permit will specify that the baghouses shall operate at all times when the associated dryer is in operation.

### **Enforcement Issue**

IDEM is aware that equipment has been operated prior to receipt of the proper permit. This violation was addressed by a violation letter sent to the source on September 4, 2009.

### **Emission Calculations**

See Appendix A of this document for detailed emission calculations.

## County Attainment Status

The source is located in Clark County.

| Pollutant   | Designation   |
|---|---|
| SO <sub>2</sub>   | Better than national standards.   |
| CO  | Unclassifiable or attainment effective November 15, 1990.                       |
| O <sub>3</sub>  | Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup> |
| PM <sub>10</sub>  | Unclassifiable effective November 15, 1990.                                     |
| NO <sub>2</sub>   | Cannot be classified or better than national standards.                         |
| Pb  | Not designated.   |
| <sup>1</sup> Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.<br>Basic nonattainment designation effective federally 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 Counties 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 Counties 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. Clark 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

Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8<sup>th</sup>, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

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

(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                | 8.02      |
| PM <sub>10</sub>  | 23.84     |
| PM <sub>2.5</sub> | 23.84     |
| SO <sub>2</sub>   | 3.19      |
| VOC               | 1.70      |
| CO                | 26.02     |
| NO <sub>x</sub>   | 30.98     |

| HAPs         | tons/year   |
|--------------|-------------|
| hexane       | 0.54        |
| <b>Total</b> | <b>0.56</b> |

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

- (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

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.4c, Subpart Dc, are not included in the permit for the boiler. The maximum heat input capacity of the boiler is less than 10 MMBtu/hr.
- (b) The requirements of the New Source Performance Standard for Sulfuric Acid Plants, 40 CFR 60.8, Subpart H, are not included in the permit for the sulfuric acid storage operation. The source uses sulfuric acid but does not produce it.
- (c) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.11b, Subpart Kb, are not included in the permit for the storage vessels. None of the liquid raw materials are organic and the capacity of each storage tank is less than 75 cubic meters.

- (d) The requirements of the New Source Performance Standard for Metallic Mineral Processing Plants, 40 CFR 60.38, Subpart LL, are not included in the permit for the source. This source does not process raw ore.
- (e) The requirements of the New Source Performance Standard for Non-metallic Mineral Processing Plants, 40 CFR 60.67, Subpart OOO, are not included in the permit for the source. The raw material, magnesium silicate is not listed as a non-metallic mineral.
- (f) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

### State Rule Applicability - Entire Source

- (a) 326 IAC 2-1.1-5 (Nonattainment New Source Review)  
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM<sub>2.5</sub>), is (*limited to*) less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (b) 326 IAC 2-6 (Emission Reporting)  
This source is located in Clark 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.
- (c) 326 IAC 5-1 (Opacity Limitations)  
Since the source is located in Jeffersonville, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (d) 326 IAC 6.5 (Particulate Emission Limitation for Source Located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, and Wayne Counties.  
The source is located in Clark County, but the potential to emit particulate matter from the source is less than 100 tons per year and the actual particulate emissions are less than 10 tons per year, therefore, the requirements of 326 IAC 6.5 do not apply.

### State Rule Applicability – Individual Facilities

#### Dryer 1

- (e) 326 IAC 6-2 (Particulate Emission Limitations for Source of Indirect Heating)  
The requirements of 326 IAC 6-2 do not apply because Dryer 1 is a source of direct heating.
- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The requirements of 326 IAC 6-3 do not apply because Dryer 1 is exempt pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate is less than 0.551 lb/hr.

#### Dryer 2

- (g) 326 IAC 6-2 (Particulate Emission Limitations for Source of Indirect Heating)  
The requirements of 326 IAC 6-2 do not apply because Dryer 2 is a source of direct heating.
- (h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 do not apply because Dryer 2 is exempt pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate is less than 0.551 lb/hr.

However, since the baghouse, PC-420, is considered an integral part of Dryer 2 and is necessary to comply with 326 IAC 6-3-2, particulate emissions from Dryer 2 shall be controlled by the integral baghouse at all times the dryer is in operation.

- (i) 326 IAC 2-6.1 (Minor Source Operating Permit)  
The integral baghouse used in conjunction with Dryer 2, PC-420, shall be in operation at all times that Dryer 2 is in operation.

#### Dryer 3

- (j) 326 IAC 6-2 (Particulate Emission Limitations for Source of Indirect Heating)  
The requirements of 326 IAC 6-2 do not apply because Dryer 3 is a source of direct heating.
- (k) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 do not apply because Dryer 3 is exempt pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate is less than 0.551 lb/hr.

However, since the baghouse, PC-480, is considered an integral part of Dryer 3 and is necessary to comply with 326 IAC 6-3-2, particulate emissions from Dryer 3 shall be controlled by the integral baghouse at all times the dryer is in operation.

- (l) 326 IAC 2-6.1 (Minor Source Operating Permit)  
The integral baghouse used in conjunction with Dryer 3, PC-480, shall be in operation at all times that Dryer 3 is in operation.

#### Pilot Dryer

- (m) 326 IAC 6-2 (Particulate Emission Limitations for Source of Indirect Heating)  
The requirements of 326 IAC 6-2 do not apply because Pilot Dryer is a source of direct heating.
- (n) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 do not apply because Dryer 1 is exempt pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate is less than 0.551 lb/hr.

#### Conveying Operations

- (o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 do not apply because the conveying operations are exempt pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate is less than 0.551 lb/hr.

#### Line 2 Product Handling

- (p) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 do not apply because Line 2 Product Handling is exempt pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate is less than 0.551 lb/hr.

#### Line 3 Product Handling

- (q) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 do not apply because Line 3 Product Handling is not a manufacturing process.

#### Boiler

- (r) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
Pursuant to 326 IAC 6-2, particulate emissions from the boiler shall not exceed 0.6 lb/MMBtu.

The limit is 0.6 lb/MMBtu. Based on the calculations in Appendix A of this TSD, the source is able to comply with the requirements of 326 IAC 6-2-4.

#### Water Heater

- (s) 326 IAC 6-2 (Particulate Emission Limitations for Source of Indirect Heating)  
The requirements of 326 IAC 6-2 do not apply because the water heater is a source of direct heating.
- (t) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 do not apply because the water heater is exempt pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate is less than 0.551 lb/hr.

### **Compliance Determination and Monitoring Requirements**

There are no compliance determination and monitoring requirements required for this renewal.

### **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 November 23, 2009.

### **Conclusion**

The operation of this synthetic magnesium silicate (Magnesol) manufacturing source shall be subject to the conditions of the attached MSOP Renewal No. 019-28800-00050.

|                     |
|---------------------|
| <b>IDEM Contact</b> |
|---------------------|

- (a) Questions regarding this proposed permit can be directed to Jillian Bertram 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)234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Boiler**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

4.2

36.7

| Emission Factor in lb/MMCF    | Pollutant |       |     |             |     |     |
|-------------------------------|-----------|-------|-----|-------------|-----|-----|
|                               | PM*       | PM10* | SO2 | NOx         | VOC | CO  |
|                               | 1.9       | 7.6   | 0.6 | 100         | 5.5 | 84  |
|                               |           |       |     | **see below |     |     |
| Potential Emission in tons/yr | 0.0       | 0.1   | 0.0 | 1.8         | 0.1 | 1.5 |

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Boiler**

**HAPs Emissions**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

|                               | HAPs - Organics    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 3.849E-05          | 2.200E-05                  | 1.375E-03               | 3.299E-02         | 6.232E-05          |

|                               | HAPs - Metals   |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 9.165E-06       | 2.016E-05          | 2.566E-05           | 6.966E-06            | 3.849E-05         |

Methodology is the same as previous page.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Water Heater**

**Company Name: Dallas Group of America  
Address City IN Zip: 1402 Fabricon Blvd., Jeffersonville, IN 47130  
Permit Number: 019-28800-00050  
Reviewer: Jillian Bertram  
Date: 12/1/2009**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

3.8

33.3

| Emission Factor in lb/MMCF    | Pollutant |       |     |             |     |     |
|-------------------------------|-----------|-------|-----|-------------|-----|-----|
|                               | PM*       | PM10* | SO2 | NOx         | VOC | CO  |
|                               | 1.9       | 7.6   | 0.6 | 100         | 5.5 | 84  |
|                               |           |       |     | **see below |     |     |
| Potential Emission in tons/yr | 0.0       | 0.1   | 0.0 | 1.7         | 0.1 | 1.4 |

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Water Heater  
HAPs Emissions**

**Company Name: Dallas Group of America**  
**Address City IN Zip: 1402 Fabricon Blvd., Jeffersonville, IN 47130**  
**Permit Number: 019-28800-00050**  
**Reviewer: Jillian Bertram**  
**Date: 12/1/2009**

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 3.495E-05          | 1.997E-05                  | 1.248E-03               | 2.996E-02         | 5.659E-05          |

| HAPs - Metals                 |                 |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 8.322E-06       | 1.831E-05          | 2.330E-05           | 6.325E-06            | 3.495E-05         |

Methodology is the same as previous page.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Dryer 1**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

7.5

65.7

| Emission Factor in lb/MMCF    | Pollutant |       |     |             |     |     |
|-------------------------------|-----------|-------|-----|-------------|-----|-----|
|                               | PM*       | PM10* | SO2 | NOx         | VOC | CO  |
|                               | 1.9       | 7.6   | 0.6 | 100         | 5.5 | 84  |
|                               |           |       |     | **see below |     |     |
| Potential Emission in tons/yr | 0.1       | 0.2   | 0.0 | 3.3         | 0.2 | 2.8 |

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Dryer 1**

**HAPs Emissions**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 6.899E-05          | 3.942E-05                  | 2.464E-03               | 5.913E-02         | 1.117E-04          |

| HAPs - Metals                 |                 |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 1.643E-05       | 3.614E-05          | 4.599E-05           | 1.248E-05            | 6.899E-05         |

Methodology is the same as previous page.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Dryer 2**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

15.0

131.4

| Emission Factor in lb/MMCF    | Pollutant |       |     |             |     |     |
|-------------------------------|-----------|-------|-----|-------------|-----|-----|
|                               | PM*       | PM10* | SO2 | NOx         | VOC | CO  |
|                               | 1.9       | 7.6   | 0.6 | 100         | 5.5 | 84  |
|                               |           |       |     | **see below |     |     |
| Potential Emission in tons/yr | 0.1       | 0.5   | 0.0 | 6.6         | 0.4 | 5.5 |

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Dryer 2**

**HAPs Emissions**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 1.380E-04          | 7.884E-05                  | 4.928E-03               | 1.183E-01         | 2.234E-04          |

| HAPs - Metals                 |                 |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 3.285E-05       | 7.227E-05          | 9.198E-05           | 2.497E-05            | 1.380E-04         |

Methodology is the same as previous page.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Dryer 3**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

40.0

350.4

| Emission Factor in lb/MMCF    | Pollutant |       |     |             |     |      |
|-------------------------------|-----------|-------|-----|-------------|-----|------|
|                               | PM*       | PM10* | SO2 | NOx         | VOC | CO   |
|                               | 1.9       | 7.6   | 0.6 | 100         | 5.5 | 84   |
|                               |           |       |     | **see below |     |      |
| Potential Emission in tons/yr | 0.3       | 1.3   | 0.1 | 17.5        | 1.0 | 14.7 |

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Dryer 3**

**HAPs Emissions  
Company Name: Dallas Group of America  
Address City IN Zip: 1402 Fabricon Blvd., Jeffersonville, IN 47130  
Permit Number: 019-28800-00050  
Reviewer: Jillian Bertram  
Date: 12/1/2009**

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 3.679E-04          | 2.102E-04                  | 1.314E-02               | 3.154E-01         | 5.957E-04          |

| HAPs - Metals                 |                 |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 8.760E-05       | 1.927E-04          | 2.453E-04           | 6.658E-05            | 3.679E-04         |

Methodology is the same as previous page.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Pilot Dryer**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.3

2.2

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

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Pilot Dryer**

**HAPs Emissions  
Company Name: Dallas Group of America  
Address City IN Zip: 1402 Fabricon Blvd., Jeffersonville, IN 47130  
Permit Number: 019-28800-00050  
Reviewer: Jillian Bertram  
Date: 12/1/2009**

|                               | HAPs - Organics    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 2.300E-06          | 1.314E-06                  | 8.213E-05               | 1.971E-03         | 3.723E-06          |

|                               | HAPs - Metals   |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 5.475E-07       | 1.205E-06          | 1.533E-06           | 4.161E-07            | 2.300E-06         |

Methodology is the same as previous page.

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

**Appendix A: Emissions Calculations  
Dryers Process Emissions**

**Company Name: Dallas Group of America  
Address City IN Zip: 1402 Fabricon Blvd., Jeffersonville, IN 47130  
Permit Number: 019-28800-00050  
Reviewer: Jillian Bertram  
Date: 12/1/2009**

| <b>Emission Unit</b> | <b>Baghouse</b> | <b>Grain Loading<br/>(g/dscf)</b> | <b>Flow Rate<br/>(acfm)</b> | <b>PM/PM10/P<br/>M2.5<br/>(tons/yr) *</b> |
|----------------------|-----------------|-----------------------------------|-----------------------------|---|
| Dryer 2              | PC-420          | 0.000215                          | 18750                       | 0.15134464                                |
| Dryer 3              | PC-480          | 0.000193                          | 58000                       | 0.42025474                                |

\* Baghouses function as product collectors are therefore integral to the process.  
Grain loading and flow rate provided by source

**Appendix A: Emissions Calculations  
Product Conveying**

**Company Name: Dallas Group of America  
Address City IN Zip: 1402 Fabricon Blvd., Jeffersonville, IN 47130  
Permit Number: 019-28800-00050  
Reviewer: Jillian Bertram  
Date: 12/1/2009**

| <b>Conveyor Name</b> | <b>Transition on the Conveyor System</b> | <b>No. of Transfer/Drop Points</b> | <b>Max Line Speed (tons/hr)</b> | <b>PM (tons/yr)</b> | <b>PM10 (tons/yr)</b> |
|----------------------|--|------------------------------------|---------------------------------|---------------------|-----------------------|
| PC144                | Classifier to Tank 33                    | 1                                  | 0.25                            | 0.0033              | 0.0012                |
| PC16                 | Rework to Tank 33                        | 1                                  | 0.035                           | 0.0005              | 0.0002                |
| PC19                 | Sweep-up to Trash Cans                   | 1                                  | 0.00025                         | 0.0000              | 0.0000                |
| PC4                  | Hopper to Blender                        | 1                                  | 0.0005                          | 0.0000              | 0.0000                |

**Methodology**

PM10 is equal to PM2.5

Emission Factor PM = 0.0030 lbs/ton

Emission Factor PM10 = 0.0011 lbs/ton

Emission factor from AP-42 Ch. 11.19 202 for conveying crushed stone without controls

**Appendix A: Emissions Calculations  
Product Handling**

**Company Name:** Dallas Group of America  
**Address City IN Zip:** 1402 Fabricon Blvd., Jeffersonville, IN 47130  
**Permit Number:** 019-28800-00050  
**Reviewer:** Jillian Bertram  
**Date:** 12/1/2009

| Line   | Throughput | PM<br>Emission<br>Factor<br>(lb/ton) | PM<br>Emissions<br>(lb/hr) | PM<br>Emissions<br>(tons/yr) | PM10<br>Emission<br>Factor<br>(lb/ton) | PM10<br>Emissions<br>(lb/hr) | PM10<br>Emissions<br>(tons/yr) |
|--------|------------|--------------------------------------|----------------------------|------------------------------|--|------------------------------|--------------------------------|
| Line 2 | 0.58       | 0.72                                 | 0.41                       | 1.81                         | 1.46                                   | 0.84                         | 3.68                           |
| Line 3 | 1.60       | 0.72                                 | 1.15                       | 5.05                         | 2.46                                   | 3.94                         | 17.24                          |

**Methodology**

PM10 emissions are equal to PM2.5 Emissions

Emission factors are from AP-42 Table 11.12.2 for cement unloading to an elevated storage silo

Emissions (lb/hr) = Throughput (ton/hr) \* emission factor (lb/ton)

Emissions (tons/yr) = Pollutant (lb/hr) \* 8760 (hr/yr) / 2000 (lb/ton)

Dryer 1 is disassembled and all other parts of the line are used elsewhere

**Appendix A: Emissions Calculations**  
**Source-wide Summary**

**Company Name: Dallas Group of America**  
**Address City IN Zip: 1402 Fabricon Blvd., Jeffersonville, IN 47130**  
**Permit Number: 019-28800-00050**  
**Reviewer: Jillian Bertram**  
**Date: 12/1/2009**

| <b>Emission Unit</b>    | <b>PM<br/>(tons/yr)</b> | <b>PM10<br/>(tons/yr)</b> | <b>PM2.5<br/>(tons/yr)</b> | <b>SO2<br/>(tons/yr)</b> | <b>NOx<br/>(tons/yr)</b> | <b>VOC<br/>(tons/yr)</b> | <b>CO<br/>(tons/yr)</b> | <b>Total HAP<br/>(tons/yr)</b> | <b>Single HAP<br/>(tons/yr)</b> |
|-------------------------|-------------------------|---------------------------|----------------------------|--------------------------|--------------------------|--------------------------|-------------------------|--------------------------------|---------------------------------|
| <b>Combustion</b>       |                         |                           |                            |                          |                          |                          |                         |                                |                                 |
| Boiler                  | 0.03                    | 0.14                      | 0.14                       | 0.01                     | 1.83                     | 0.10                     | 1.54                    | 0.03                           | 0.03 - hexane                   |
| Water Heater            | 0.03                    | 0.13                      | 0.13                       | 0.01                     | 1.66                     | 0.09                     | 1.40                    | 0.03                           | 0.03 - hexane                   |
| Dryer 1                 | 0.06                    | 0.25                      | 0.25                       | 0.02                     | 3.29                     | 0.18                     | 2.76                    | 0.06                           | 0.06 - hexane                   |
| Dryer 2                 | 0.12                    | 0.50                      | 0.50                       | 0.04                     | 6.57                     | 0.36                     | 5.52                    | 0.12                           | 0.12 - hexane                   |
| Dryer 3                 | 0.33                    | 1.33                      | 1.33                       | 0.11                     | 17.52                    | 0.96                     | 14.72                   | 0.33                           | 0.32 - hexane                   |
| Pilot Dryer             | 0.00                    | 0.01                      | 0.01                       | 0.00                     | 0.11                     | 0.01                     | 0.09                    | 0.00                           | negl.                           |
| <b>Process</b>          |                         |                           |                            |                          |                          |                          |                         |                                |                                 |
| Dryer 2                 | 0.15                    | 0.15                      | 0.15                       | 1.00                     | 0.00                     | 0.00                     | 0.00                    | 0.00                           | 0.00                            |
| Dryer 3                 | 0.42                    | 0.42                      | 0.42                       | 2.00                     | 0.00                     | 0.00                     | 0.00                    | 0.00                           | 0.00                            |
| <b>Conveying</b>        |                         |                           |                            |                          |                          |                          |                         |                                |                                 |
| PC144                   | 0.00                    | 0.00                      | 0.00                       | 0.00                     | 0.00                     | 0.00                     | 0.00                    | 0.00                           | 0.00                            |
| PC16                    | 0.00                    | 0.00                      | 0.00                       | 0.00                     | 0.00                     | 0.00                     | 0.00                    | 0.00                           | 0.00                            |
| PC19                    | 0.00                    | 0.00                      | 0.00                       | 0.00                     | 0.00                     | 0.00                     | 0.00                    | 0.00                           | 0.00                            |
| PC4                     | 0.00                    | 0.00                      | 0.00                       | 0.00                     | 0.00                     | 0.00                     | 0.00                    | 0.00                           | 0.00                            |
| <b>Product Handling</b> |                         |                           |                            |                          |                          |                          |                         |                                |                                 |
| Line 2                  | 1.81                    | 3.68                      | 3.68                       | 0.00                     | 0.00                     | 0.00                     | 0.00                    | 0.00                           | 0.00                            |
| Line 3                  | 5.05                    | 17.24                     | 17.24                      | 0.00                     | 0.00                     | 0.00                     | 0.00                    | 0.00                           | 0.00                            |
| <b>Total</b>            | <b>8.02</b>             | <b>23.84</b>              | <b>23.84</b>               | <b>3.19</b>              | <b>30.98</b>             | <b>1.70</b>              | <b>26.02</b>            | <b>0.58</b>                    | <b>0.56 - hexane</b>            |



# 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](http://www.idem.IN.gov)

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

TO: David C. Cousins  
The Dallas Group of America, Inc.  
1402 Fabricon Blvd  
Jeffersonville, IN 47130

DATE: March 16, 2010

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

SUBJECT: Final Decision  
Minor Source Operating Permit Renewal  
019-28800-00050

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:  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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[www.idem.IN.gov](http://www.idem.IN.gov)

March 16, 2010

TO: Jeffersonville Township Public Library

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

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

**Applicant Name: The Dallas Group of America, Inc.**  
**Permit Number: 019-28800-00050**

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                 | GHOTOPP 3/16/2010<br>The Dallas Group of America, Inc 019-28800-00050 Final       |   | Type of Mail:<br><br><b>CERTIFICATE OF MAILING ONLY</b> | AFFIX STAMP<br>HERE IF<br>USED AS<br>CERTIFICATE<br>OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 |   |  |

| Line | Article Number | Name, Address, Street and Post Office Address  | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|--|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1    |                | David C Cousins The Dallas Group of America, Inc 1402 Fabriceon Blvd Jeffersonville IN 47130 (Source CAATS) via confirmed delivery |         |                 |                            |               |                 |          |          |          |                |         |
| 2    |                | Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |
| 3    |                | Ms. Betty Hislip Silver Lakes Trailer Pk 13131 Sunnybrook Dr Memphis IN 47143-9672 (Affected Party)                                |         |                 |                            |               |                 |          |          |          |                |         |
| 4    |                | Mrs. Sandy Banet 514 Haddox Rd Henryville IN 47126 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |
| 5    |                | Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)                          |         |                 |                            |               |                 |          |          |          |                |         |
| 6    |                | Jeffersonville Twp Public 211 E Court Ave, P.O. Box 1548 Jeffersonville IN 47131-1548 (Library)                                    |         |                 |                            |               |                 |          |          |          |                |         |
| 7    |                | Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)                                    |         |                 |                            |               |                 |          |          |          |                |         |
| 8    |                | Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)                                   |         |                 |                            |               |                 |          |          |          |                |         |
| 9    |                | Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)                                 |         |                 |                            |               |                 |          |          |          |                |         |
| 10   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 11   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 12   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 13   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 14   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
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