



# 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: July 29, 2010

RE: Transilwrap Company, Inc. / 177-28861-00044

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

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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-AM.dot12/3/07



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## New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Transilwrap Company, Inc.  
300 Industrial Parkway  
Richmond, Indiana 47374**

(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.: M177-28861-00044	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 29, 2010  Expiration Date: July 29, 2015

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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)]

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The Permittee owns and operates a stationary plastic extrusion and coating source.

Source Address:	300 Industrial Parkway, Richmond, Indiana 47374
General Source Phone Number:	(765) 935-1520
SIC Code:	3081
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) extrusion line 3, constructed in October 1990, with a maximum capacity of 1,500 pounds of resin per hour;
- (b) One (1) extrusion line 5, approved for replacement in 2010, with a maximum capacity of 3,000 pounds of resin per hour;
- (c) One (1) extrusion line 7, constructed in October 1990, with a maximum capacity of 1,500 pounds of resin per hour;
- (d) One (1) extrusion coating line 2, constructed in October 1991, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 900 pounds of resin per hour;
  - (2) One (1) coater, with a maximum capacity of 300 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (e) One (1) extrusion coating line 11, constructed in March 1992, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 325 pounds per hour of plastic resin;
  - (2) One (1) coater, with a maximum capacity of 300 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (f) One (1) extrusion coating line 12, constructed in October 1991, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 1,400 pounds of resin per hour;

- (2) One (1) coater, with a maximum capacity of 1,000 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (g) One (1) coating line 16, constructed in April 2007 and approved for modification in 2010, with a maximum capacity of 250 ft/min or maximum coating of 11.5 pounds per MMin<sup>2</sup>;
- (h) One (1) extrusion coating line 18, approved for construction in 2010, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 1500 pounds of resin per hour;
  - (2) One (1) coater, with a maximum capacity of 750 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (i) Three (3) automatic grinders from lines 3, 5 and 7, identified as granulator lines 3, 5, 7, constructed in October 1990, each with a maximum capacity of grinding 200 pounds of trim plastic per hour;
- (j) Three (3) manual scrap grinders, identified as scrap granulators or manual feed granulators, constructed in October 1990, each with a maximum capacity of 1,000 pounds of scrap plastic per hour;
- (k) One (1) maintenance parts washer, constructed in 1990, with a maximum capacity of 30 gallons.
- (l) Twenty-five (25) natural gas ovens and heaters, with a combined heat input of 17.23 MMBtu/hr.

## 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, M177-28861-00044, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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- (a) All terms and conditions of permits established prior to M177-28861-00044 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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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.12 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 an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

#### B.14 Source Modification Requirement

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

#### B.15 Inspection and Entry

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

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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.16 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 an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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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]**

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

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

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

**C.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.

- (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) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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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 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.12 Response to Excursions or Exceedances**

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

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

#### **C.13 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management  
Compliance 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) extrusion line 3, constructed in October 1990, with a maximum capacity of 1,500 pounds of resin per hour;
- (b) One (1) extrusion line 5, approved for replacement in 2010, with a maximum capacity of 3,000 pounds of resin per hour;
- (c) One (1) extrusion line 7, constructed in October 1990, with a maximum capacity of 1,500 pounds of resin per hour;
- (d) One (1) extrusion coating line 2, constructed in October 1991, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 900 pounds of resin per hour;
  - (2) One (1) coater, with a maximum capacity of 300 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (e) One (1) extrusion coating line 11, constructed in March 1992, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 325 pounds per hour of plastic resin;
  - (2) One (1) coater, with a maximum capacity of 300 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (f) One (1) extrusion coating line 12, constructed in October 1991, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 1,400 pounds of resin per hour;
  - (2) One (1) coater, with a maximum capacity of 1,000 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (g) One (1) coating line 16, constructed in April 2007 and approved for modification in 2010, with a maximum capacity of 250 ft/min or maximum coating of 11.5 pounds per MMin<sup>2</sup>;
- (h) One (1) extrusion coating line 18, approved for construction in 2010, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 1500 pounds of resin per hour;
  - (2) One (1) coater, with a maximum capacity of 750 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (i) Three (3) automatic grinders from lines 3, 5 and 7, identified as granulator lines 3, 5, 7, constructed in October 1990, each with a maximum capacity of grinding 200 pounds of trim plastic per hour;
- (j) Three (3) manual scrap grinders, identified as scrap granulators or manual feed granulators, constructed in October 1990, each with a maximum capacity of 1,000 pounds of scrap plastic per hour.

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

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

**D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the each extrusion Line and each granulator shall be limited as follows:

<b>Emission Units</b>	<b>Maximum Process Weight Rate (pounds per hour)</b>	<b>Particulate Emission Limit (pounds per hour)</b>
Extrusion line 3	1,500	3.38
Extrusion line 5	3,000	5.38
Extrusion line 7	1,500	3.38
Extrusion line 2	900	2.40
Extrusion line 11	325	1.21
Extrusion line 12	1,400	3.20
Extrusion line 18	1,500	3.38
Granulator line 3	200	0.88
Granulator line 5	200	0.88
Granulator line 7	200	0.88
Each manual feed Granulator	1,000	2.58

The pound per hour limitation was calculated using the following equation:

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

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]**

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee may not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating line 16.

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

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) compliance with the VOC content and usage limitations shall be determined using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

### **D.1.5 Record Keeping Requirement**

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- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain records of the VOC delivered to the coating line 16 each month. These records shall be complete and sufficient to establish compliance with the VOC emission limit. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.
  
- (b) Section C - General Record Keeping contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (k) One (1) maintenance parts washer, constructed in 1990, with a maximum capacity of 30 gallons.
- (l) Twenty-five (25) natural gas ovens and heaters, with a combined heat input of 17.23 MMBtu/hr.

(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 Volatile Organic Compounds (VOC) [326 IAC 8-3]

Pursuant to 326 IAC 8-3-2, (Cold Cleaner Operation) the owner or operator of this cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirement;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**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>	Transilwrap Company, Inc
<b>Address:</b>	300 Industrial Parkway
<b>City:</b>	Richmond, Indiana 47374
<b>Phone #:</b>	(765) 935-1520
<b>MSOP #:</b>	M177-28861-00044

I hereby certify that Transilwrap Company, Inc is :	<input type="checkbox"/> still in operation. <input type="checkbox"/> no longer in operation.
I hereby certify that Transilwrap Company, Inc is :	<input type="checkbox"/> in compliance with the requirements of MSOP 177-28861-00044. <input type="checkbox"/> not in compliance with the requirements of MSOP 177-28861-00044.

<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**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

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

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

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

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

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

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

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

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

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

\*SEE PAGE 2

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

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

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

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

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

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

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

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

**Technical Support Document (TSD) for New Source Review and  
Minor Source Operating Permit (MSOP)**

**Source Description and Location**

**Source Name:** Transilwrap Company, Inc.  
**Source Location:** 300 Industrial Parkway, Richmond, IN 47374  
**County:** Wayne  
**SIC Code:** 3081  
**Operation Permit No.:** M177- 28861- 00044  
**Permit Reviewer:** Renee Traivaranon

On January 8, 2010 and May 14, 2010, the Office of Air Quality (OAQ) received an application and additional information from Transilwrap Company, Inc. related to the modification of existing units and construction of a new unit at an existing plastic extrusion and coating source.

**Existing Approvals**

There have been no previous approvals issued to this source.

**County Attainment Status**

The source is located in Wayne County.

<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, 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> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Wayne County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub>

emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

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

#### Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Transilwrap Company, Inc. on January 8, 2010, relating to a replacement of the extrusion line 5 and modification of line 16. On May 14, 2010, the source has submitted additional information to add a new extrusion coating line 18, resulting in the source transitions from an exemption source to a Minor Source Operating Permit source.

The source consists of the following emission units:

- (a) One (1) extrusion line 3, constructed in October 1990, with a maximum capacity of 1,500 pounds of resin per hour;
- (b) One (1) extrusion line 5\*, approved for replacement in 2010, with a maximum capacity of 3,000 pounds of resin per hour;
- (c) One (1) extrusion line 7, constructed in October 1990, with a maximum capacity of 1,500 pounds of resin per hour;
- (d) One (1) extrusion coating line 2, constructed in October 1991, consisting of the following:
- (1) One (1) extruder, with a maximum capacity of 900 pounds of resin per hour;
  - (2) One (1) coater, with a maximum capacity of 300 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (e) One (1) extrusion coating line 11, constructed in March 1992, consisting of the following:
- (1) One (1) extruder, with a maximum capacity of 325 pounds per hour of plastic resin;
  - (2) One (1) coater, with a maximum capacity of 300 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;

- (f) One (1) extrusion coating line 12, constructed in October 1991, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 1,400 pounds of resin per hour;
  - (2) One (1) coater, with a maximum capacity of 1,000 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (g) One (1) coating line 16\*\*, constructed in April 2007 and approved for modification in 2010, with a maximum capacity of 250 ft/min or maximum coating of 11.5 pounds per MMin<sup>2</sup>;
- (h) One (1) extrusion coating line 18, approved for construction in 2010, consisting of the following:
  - (1) One (1) extruder, with a maximum capacity of 1500 pounds of resin per hour;
  - (2) One (1) coater, with a maximum capacity of 750 ft/min or maximum coating of 0.018 pounds per MMin<sup>2</sup>;
- (i) Three (3) automatic grinders from lines 3, 5 and 7, identified as granulator lines 3, 5, 7, constructed in October 1990, each with a maximum capacity of grinding 200 pounds of trim plastic per hour;
- (j) Three (3) manual scrap grinders, identified as scrap granulators or manual feed granulators, constructed in October 1990, each with a maximum capacity of 1,000 pounds of scrap plastic per hour;
- (k) One (1) maintenance parts washer, constructed in 1990, with a maximum capacity of 30 gallons.
- (l) Twenty-five (25) natural gas ovens and heaters, with a combined heat input of 17.23 MMBtu/hr.

Note: Each above unit does not have any control devices and vent inside the building.  
\*This new unit will replace the old unit which was constructed in October 1990 and had a maximum capacity of 800 pounds per hour of resin;  
\*\* The modification to coating line 16, has different capacity and use different type of coating - see the calculation in the TSD.

**Unpermitted Emission Units and Pollution Control Equipment**

There is no unpermitted emission unit during this review.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.6
PM10 <sup>(1)</sup>	2.1
PM2.5	2.1
SO <sub>2</sub>	negligible
NO <sub>x</sub>	7.5
VOC	30.2
CO	6.3

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

HAPs	Potential To Emit (tons/year)
Hexane	0.12
Formaldehyde	0.005
Xylene	2.6
Lead	negligible
Chromium	negligible
Acrolein	negligible
Acetaldehyde	negligible
Propionaldehyde	negligible
<b>TOTAL HAPs</b>	<b>3.41</b>

Criteria Pollutants

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of pollutants are each less than one hundred (100) tons per year, but PTE of VOC is greater than twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

Hazardous Air Pollutants

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

**PTE of the Entire Source After Issuance of the MSOP**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
All Extrusion Lines	0.52	0.52	0.52	--	--	6.26	--	--	--
All Granulators	0.99	0.99	0.99	--	--	--	--	--	--
Coating Lines (2, 11, 12)	--	--	--	--	--	2.60	--	2.60	1.41 (Methanol)
Coating Line (16)	--	--	--	--	--	15.09	--	--	--
Coating Line (18)	--	--	--	--	--	1.09	--	--	--
Cleanup solvents	--	--	--	--	--	4.77	--	0.66	0.66 (Xylene)
Combustion	0.14	0.57	0.57	0.1	--	0.41	6.34	0.14	0.14
Fugitive Emissions	--	--	--	--	--	--	--	--	--
<b>Total PTE of Entire Source</b>	1.65	2.09	2.09	0.1	--	30.2	6.34	5.09	1.41
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
-- = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF (326 IAC 12), are not included in the permit, since this source does not print or coat flexible vinyl or urethane products.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination to the Source</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each facility at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.

**State Rule Applicability Determination to the Facilities**

Extrusion and Grinding Operations

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each extrusion line and each granulator shall be limited as follows:

<b>Emission Units</b>	<b>Maximum Process Weight Rate (pounds per hour)</b>	<b>Particulate Emission Limit (pounds per hour)</b>
Extrusion line 3	1,500	3.38
Extrusion line 5	3,000	5.38
Extrusion line 7	1,500	3.38
Extrusion line 2	900	2.40
Extrusion line 11	325	1.21
Extrusion line 12	1,400	3.20
Extrusion line 18	1,500	3.38
Granulator line 3	200	0.88
Granulator line 5	200	0.88
Granulator line 7	200	0.88
Each Manual Granulator	1,000	2.58

The pound per hour limitation was calculated using the following equation:

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

Each Extrusion Operation and Granulator operation is complied with the requirements of 326 IAC 6-3-2. (See Page 1 and 3 of calculation to TSD Appendix A).

- (b) 326 IAC 8-2-5 (Plastic Coating Operation)  
 Pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-5 do not apply to each extrusion line nor each granulator, since actual VOC of each line (including the PTE) is less than fifteen (15) pounds per day.

Coating Operations

- (a) 326 IAC 8-2-5 (Plastic Coating Operation)

Coating line 2, 11, 12, 18

Pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-5 do not apply to the coating line 2, 11, 12, and 18 since the actual VOC of each line is less than fifteen (15) pounds per day.

Coating line 16

Pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-5 apply to the coating line 16 since it was constructed after July 1, 1990 and VOC emissions are greater than fifteen (15) pounds per day.

Pursuant to 8-2-5, the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of two and nine-tenths (2.9) pounds per gallon excluding water from the coating line 16.

The source uses compliance coating materials. Therefore, record keeping is required to verify the content of the material to show compliance with this limit.

Degreasing Operations

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

- (a) Only cleaning rags were used in the extrusions lines, therefore, the requirements of 326 IAC 8-3-2 are not applicable to this operation.
- (b) The requirements of 326 IAC 8-3-2, (Cold Cleaner Operation) apply to the parts washer since it was constructed after January 1980. Pursuant to 326 IAC 8-3-2, (Cold Cleaner Operation) the owner or operator of this cold cleaning facility shall:
  - (1) equip the cleaner with a cover;
  - (2) equip the cleaner with a facility for draining cleaned parts;
  - (3) close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) provide a permanent, conspicuous label summarizing the operating requirement;
  - (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

<b>Conclusion and Recommendation</b>
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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 January 8, 2010 and additional information on May 14, 2010.

There are no EPA Emission factors for the source operations, therefore, alternative emission factors were used for extrusions, extrusion coating and granulator operations and source has discussed it with IDEM Data Support Section, and it has been accepted. (See the TSD appendix A.)

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Review MSOP No. 177- 28861- 00044. The staff recommends to the Commissioner that this New Source Review and MSOP be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Renee Traivaranon 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) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.
- (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  
Plastic Extrusions**

**Company Name: Transilwrap Company, Inc.  
Address City IN Zip: 300 Industrial Parkway, Richmond, IN 47374  
Permit Number: M177-28861-00044  
Reviewer: Renee Traivaranon  
Date: June 2, 2010**

**Criteria Air Pollutant Emissions from Extrusion Operation**

Equipment ID	Component	Max Rate (lb/hr)	VOC			PM		
			Emission Factor (lb/1,000,000 lb)	<sup>1</sup> Emission Rate (lb/hr)	<sup>2</sup> Emission Rate (tpy)	Emission Factor (lb/1,000,000 lb)	<sup>1</sup> Emission Rate (lb/hr)	<sup>2</sup> Emission Rate (tpy)
Line 3	PS Resin	1,500	150	0.225	0.986	30.3	0.045	0.199
Line 5*	PS Resin	800	150	0.120	0.526	30.3	0.024	0.106
Line 7	PS Resin	1,500	150	0.225	0.986	30.3	0.045	0.199
Line 2	EVA Resin	900	128.2	0.115	0.504	1	0.001	0.004
Line 11	EVA Resin	325	128.2	0.042	0.184	1	0.000	0.001
Line 12	EVA Resin	1,400	128.2	0.179	0.784	1	0.001	0.006
Line 18	EVA Resin	1,500	128.2	0.192	0.841	1	0.002	0.007
<b>Totals</b>		<b>7,925</b>		<b>1.098</b>	<b>4.809</b>		<b>0.119</b>	<b>0.522</b>

**Hazardous Air Pollutant Emissions from Extrusion Operation**

Extruder ID	Component	Max Rate (lb/hr)	Formaldehyde Emissions Rate (tpy)	Acrolein Emission Rate (tpy)	Acetaldehyde Emission Rate (tpy)	Propionaldehyde Emission Rate (tpy)
Line 3	PS Resin	1,500	-	-	-	-
Line 5*	PS Resin	800	-	-	-	-
Line 7	PS Resin	1,500	-	-	-	-
Line 2	EVA Resin	900	0.00051	0.00004	0.00039	0.00008
Line 11	EVA Resin	325	0.00019	0.00001	0.00014	0.00003
Line 12	EVA Resin	1,400	0.00080	0.00006	0.00061	0.00012
Line 18	EVA Resin	1,500	0.00085	0.00007	0.00066	0.00013
<b>Totals</b>			<b>0.00235</b>	<b>0.00018</b>	<b>0.00181</b>	<b>0.00036</b>

**Potential Emissions from Cleanup**

Product Name	Cleanup Solvent Usage (gal/day)	Density (gal/day)	VOC Content (wt%)	VOC and HAP Emissions (tons/yr)
Xylene	0.5	7.26	100%	0.662

**\* Potential Emissions after Modifications for Line 5**

Equipment ID	Component	Max Rate (lb/hr)	VOC		
			Emission Factor (lb/1,000,000 lb)	<sup>1</sup> Emission Rate (lb/hr)	<sup>2</sup> Emission Rate (tpy)
Line 5	PS Resin	3,000	150	0.450	1.971

**Notes**

Emission Factor Source for EVA: "Development of Emission Factors for EVA and EMA Copolymer Processing", Journal of Air and Waste Management Association, Volume 47, October 1997. Die temp used is 400 °F  
VOC and Styrene emission factors for Polystyrene from extrusion were taken from a emission test conducted for Nova Chemical at the Battelle Institute-provided by source and reviewed by IDEM CDS.

**Methodology**

<sup>1</sup> Emission Rate (lb/hr) = Max Process Rate (lb/hr) x Emission Factor (lbs/1,000,000 lbs)

<sup>2</sup> Emission Rate (tpy) = Emission Rate (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

<sup>3</sup> Emission Rate (tpy) = Max Process Rate (lb/hr) x Emission Factor (lbs/1,000,000 lbs)x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Coating and Cleaning**

**Company Name: Transilwrap Company, Inc.  
Address City IN Zip: 300 Industrial Parkway, Richmond, IN 47374  
Permit Number: M177-28861-00044  
Reviewer: Renee Traivaranon  
Date: June 2, 2010**

**Potential Emissions for Extrusion Coaters**

Equipment ID	Maximum Width (in)	Maximum Line Speed (ft/min)	<sup>1</sup> Maximum Throughput (MMin <sup>2</sup> /yr)	Max Primer Coverage (lbs/MMin <sup>2</sup> )	Throughput Receiving Adhesion Promotor A	<sup>2</sup> VOC /HAP Content (wt%)	Potential VOC Emissions (lbs/day)	<sup>3</sup> Potential VOC/HAP Emissions (tons/yr)
Line 2	45	300	85,147.20	0.018	100.0%	57.0%	2.393	0.44
Line 11	16	300	30,274.56	0.018	100.0%	57.0%	0.851	0.16
Line 12	62	1,000	391,046.40	0.018	100.0%	57.0%	10.992	2.01
<b>Total</b>								<b>2.60</b>

**Potential Emissions from Line 16 Coater**

Equipment ID	Maximum Width (in)	Maximum Line Speed (ft/min)	<sup>1</sup> Maximum Throughput (MMin <sup>2</sup> /yr)	Coating Coverage (lbs/MMin <sup>2</sup> )	Product Name	VOC Content (wt%)	<sup>4</sup> Potential VOC Emissions (lbs/day)	<sup>5</sup> Potential VOC Emissions (tons/yr)
Line 16	65	250	102,492.00	1.1	Raqua-Bond	1.00%	3.09	0.56

**Potential Emissions from Line 16 Coater after Coating Changes**

Equipment ID	Maximum Width (in)	Maximum Line Speed (ft/min)	<sup>1</sup> Maximum Throughput (MMin <sup>2</sup> /yr)	Coating Coverage (lbs/MMin <sup>2</sup> )	Product Name	VOC Content (wt%)	<sup>4</sup> Potential VOC Emissions (lbs/day)	<sup>5</sup> Potential VOC Emissions (tons/yr)
Line 16	65	250	102,492.00	11.5	Matte Coating	2.56%	82.67	15.09

**Potential Emissions from New Line 18**

Equipment ID	Maximum Width (in)	Maximum Line Speed (ft/min)	<sup>1</sup> Maximum Throughput (MMin <sup>2</sup> /yr)	Coating Coverage (lbs/MMin <sup>2</sup> )	Throughput Receiving Adhesion Promotor A	VOC Content (wt%)	<sup>4</sup> Potential VOC Emissions (lbs/day)	<sup>5</sup> Potential VOC Emissions (tons/yr)
Line 18	45	750	212,868.00	0.018	100%	57.00%	5.98	1.09

**Potential Emissions from Solvent Cleanup Operations**

Equipment ID	<sup>6</sup> Cleanup Solvent Usage (lbs/MMin <sup>2</sup> )	VOC Content (wt%)	VOC Emissions (tons/yr)
Line #2	0.01	100%	0.426
Line #11	0.01	100%	0.151
Line #12	0.01	100%	1.955
Line #16	0.01	100%	0.512
Line #18	0.01	100%	1.064
<b>Total</b>			<b>4.109</b>

Methodology

<sup>1</sup> Maximum Press Throughput of the Extrusion Coaters and Coater (MMin<sup>2</sup>/yr) = Maximum Press Speed (ft/hr) \* 12 (in/ft) \* Maximum Print Width (in) \* 8,760 (hr/yr) / 1,000,000 (in<sup>2</sup>/MMin<sup>2</sup>)

<sup>2</sup> The VOC and HAP content for the AW Primer Concentrate is estimated at a maximum of 40%, which is assumed to be all Methanol

<sup>3</sup> Potential VOC/HAP Emissions (tpy) = Maximum Throughput (MMin<sup>2</sup>/yr) x Product Coverage (lbs/MMin<sup>2</sup>) x VOC or HAP Content (%) x 1 ton / 2000 lbs

<sup>4</sup> Potential VOC Emissions (lbs/day) = Maximum line speed (ft/min) x 12 in/ft x Max Width (in) x 60 min/hr x 24 hrs/day x 1/1,000,000) x Coating Coverage (lbs/MMin<sup>2</sup>) x VOC Content (wt%)

<sup>5</sup> Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/day) x 365 days/yr x 1 ton/2000 lbs

<sup>6</sup> Cleanup solvent used is IPA and MEK since these are both 100 percent VOC and do not contain HAPs the usage was combined

**Appendix A: Emissions Calculations  
Granulators**

**Company Name:** Transilwrap Company, Inc.  
**Address City IN Zip:** 300 Industrial Parkway, Richmond, IN 47374  
**Permit Number:** M177-28861-00044  
**Reviewer:** Renee Traivaranon  
**Date:** June 2, 2010

***Potential to Emit Criteria Air Pollutants from the Scrap Granulators (Manual feed granulators)***

Number of Manual Feed Granulators	3
Maximum Hourly Resin Throughput (lbs)	1,000
Maximum Hourly Scrap Throughput (lbs)	3,000
Emission Factor for PM (lbs/ton)	0.06
Control Efficiency of Cyclone and Filter	0%
Potential Hourly PM Emissions (lbs)	0.0900
Potential Annual PM Emissions (tons)	0.3942
Actual Annual PM Emissions (tons)	0.9856

***Potential to Emit Criteria Air Pollutants from Granulators from Extrusion lines 3, 5 and 7***

Number of Granulators	3
Maximum Hourly Resin Throughput (lbs)	200
Maximum Hourly Scrap Throughput (lbs)	600
Emission Factor for PM (lbs/ton)	0.06
Control Efficiency of Cyclone and Filter	0%
Potential Hourly PM Emissions (lbs)	0.0180
Potential Annual PM Emissions (tons)	0.0788
Actual Annual PM Emissions (tons)	8.1E-06

**Notes and Methodology**

The emission factor comes from the latest version of FIRE for Feed Manufacture, Grinding without control (SCC 30200805).

**Appendix A: Emissions Calculations  
Combustion**

**Company Name: Transilwrap Company, Inc.**  
**Address City IN Zip: 300 Industrial Parkway, Richmond, IN 47374**  
**Permit Number: M177-28861-00044**  
**Reviewer: Renee Traivaranon**  
**Date: June 2, 2010**

**Natural Gas Fired Unit Specifications**

Unit Descriptions	Maximum Heat Input Capacity Per Unit [MMBtu/hr]	Number of Units	Combined Maximum Heat Input Capacity [MMBtu/hr]	Potential Natural Gas Usage [scf/hr] <sup>(1)</sup>
Line 2 Drying Oven	1.43	1	1.430	1,430
Line 11 Drying Oven	1.43	1	1.430	1,430
Line 12 Drying Oven	3.44	1	3.440	3,440
Line 18 Drying Oven	2.00	1	2.000	2,000
Line 16 Drying Oven	3.20	1	3.200	3,200
Line 16 Room Reheater	0.40	1	0.400	400
Building/Space Heaters	1.00	2	2.000	2,000
Tuber Heaters	0.20	16	3.200	3,200
Front Office Heater	0.13	1	0.126	126
<b>TOTAL</b>		<b>25</b>	<b>17.226</b>	<b>17,226</b>

**Natural Gas Fired Unit Potential Emissions**

Pollutant	Emission Factor [lb/MMscf] <sup>(2)</sup>	Potential Emissions [lb/hr] <sup>(3)</sup>	Potential Emissions [tpy] <sup>(4)</sup>
NO <sub>x</sub>	100	1.72	7.54
CO	84	1.45	6.34
VOC	5.5	0.09	0.41
SO <sub>2</sub>	0.6	0.01	0.05
PM	1.9	0.03	0.14
PM <sub>10</sub>	7.6	0.13	0.57
Benzene	2.1E-03	0.000	1.6E-04
Dichlorobenzene	1.2E-03	0.000	9.1E-05
Formaldehyde	7.5E-02	0.001	0.006
Hexane	1.8E+00	0.031	0.136
Toluene	3.4E-03	0.000	2.6E-04
Lead	5.0E-04	0.000	3.8E-05
Cadmium	1.1E-03	0.000	8.3E-05
Chromium	1.4E-03	0.000	1.1E-04
Manganese	3.8E-04	0.000	2.9E-05
Nickel	2.1E-03	0.000	1.6E-04
Combined HAPs	NA	0.033	0.142

**Notes and Methodology**

(1) Potential Natural Gas Usage [scf/hr] = Combined Maximum Heat Input Capacity [MMBtu/hr] x 1,000,000 Btu/MMBtu / 1,000 Btu/scf  
 Assumed heating value of natural gas to be 1,000 Btu/scf.

(2) Emission factors are from AP-42, Tables 1.4-1 and 1.4-2. Utilized the NO<sub>x</sub> and CO emission factors for an uncontrolled small boiler (i.e. < 100 MMBtu/hr heat input). All emission factors are for normal firing. The PM/PM10 emission factor is filterable and condensable particulate combined.

The HAPs above include the 5 organic HAPs and 5 metal HAPs with the highest emission factors.

(3) Potential Emissions [lb/hr] = Total Potential Natural Gas Usage [scf/hr] / 1,000,000 scf/MMscf x Emission Factor [lb/MMscf]

(4) Potential Emissions [tpy] = Potential Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations  
Summary**

**Company Name: Transilwrap Company, Inc.  
Address City IN Zip: 300 Industrial Parkway, Richmond, IN  
Permit Number: M177-28861-00044  
Reviewer: Renee Traivaranon  
Date: June 2, 2010**

**Potential Emissions Summary before Modifications**

Emitting Activities	Air Pollutants [tpy]							
	CO	NO <sub>x</sub>	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	Highest Single HAP	Combined HAPs
Extrusion Lines (2, 3,7,11,12)	-	-	0.52	0.52	-	3.40	0.004	0.005
All Plastic Grinding	-	-	0.99	0.99	-	-	-	-
Coating Lines (2,11,12)	-	-	-	-	-	2.60	1.41	2.60
Coating Line 16	-	-	-	-	-	0.56	-	-
All Solvent Cleanup	-	-	-	-	-	2.53	0.67	0.67
Combustion	6.34	7.54	0.14	0.57	0.05	0.41	0.14	0.14
<b>Total</b>	<b>6.34</b>	<b>7.54</b>	<b>1.65</b>	<b>2.08</b>	<b>0.05</b>	<b>9.51</b>	<b>3.41</b>	<b>3.41</b>

**Potential Emissions Summary after Modifications**

Emitting Activities	Air Pollutants [tpy]							
	CO	NO <sub>x</sub>	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	Highest Single HAP	Combined HAPs
All Extrusion Lines	-	-	0.52	0.52	-	6.25	0.004	0.005
All Plastic Grinding	-	-	0.99	0.99	-	-	-	-
Coating Lines (2, 11, 12)	-	-	-	-	-	2.60	1.41	2.60
Coating Line (16)	-	-	-	-	-	15.09	-	-
Coating Line (18)	-	-	-	-	-	1.09	-	-
All Solvent Cleanup	-	-	-	-	-	4.77	0.67	0.67
Combustion	6.34	7.54	0.14	0.57	0.05	0.41	0.14	0.14
<b>Total</b>	<b>6.34</b>	<b>7.54</b>	<b>1.65</b>	<b>2.08</b>	<b>0.05</b>	<b>30.22</b>	<b>3.41</b>	<b>3.41</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:** Jerry Krupa  
Transilwrap Company Inc.  
300 Industrial Parkway  
Richmond, IN 47374

**DATE:** July 29, 2010

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

**SUBJECT:** Final Decision  
MSOP  
177-28861-00044

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:  
Keith Badgley, Responsible Official  
David Howard, Consultant, Cornerstone Environmental  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



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July 29, 2010

TO: Morrisson Reeves Public Library

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

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

**Applicant Name: Transilwrap Company, Inc.**  
**Permit Number: 177-28861-00044**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	DPABST 7/29/2010 Transilwrap Company Inc 177-28861-00044 (Final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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		Jerry Krupa Transilwrap Company Inc 300 Industrial Pkwy Richmond IN 47374 (Source CAATS) (CONFIRM DELIVERY)									
2		Keith Badgley Site Mgr Transilwrap Company Inc 300 Industrial Pkwy Richmond IN 47374 (RO CAATS)									
3		Mr. Patrick Adkins 2894 S 950 E Hagerstown IN 47346 (Affected Party)									
4		Morrisson Reeves Public Library 80 N 6th St Richmond IN 47374-3079 (Library)									
5		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)									
6		Richmond City Council and Mayors Office 50 North 5th Street Richmond IN 47374 (Local Official)									
7		Wayne County Commissioners 401 East Main Street Richmond IN 47374 (Local Official)									
8		Mr. Randall Shrock 2764 Abington Pike Richmond IN 47374 (Affected Party)									
9		Mr. David Howard Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Court Zionsville IN 46077 (Consultant)									
10		Wayne County Health Department 401 E. Main Street Richmond IN 47374-4388 (Health Department)									
11		Champion Target and Trap 232 Industrial Parkway Richmond IN 47374 (Affected Party)									
12		Southeast Wood Treating, Inc. 5353 South D Street Richmond IN 47374 (Affected Party)									
13		Eastside Commercial Park, LLC 1010 South A Street Richmond IN 47374 (Affected Party)									
14		Milso Industries 401 Industrial Parkway Richmond IN 47374 (Affected Party)									
15											

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