



# 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 20, 2010

RE: North America Packaging / 097 - 29413 - 00445

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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Mr. Jody Wood  
North American Packaging Corporation  
6061 Guion Road  
Indianapolis, IN 46254

July 20, 2010

Re: 097-29413-00445  
Second Registration Notice-Only Change to  
R097-16528-00445

Dear Mr. Wood:

North American Packaging Corporation was issued a Registration No. R097-16528-00445 on January 29, 2003 for a stationary polyethylene bottle manufacturing plant located at 6061 Guion Road Indianapolis, IN 46254. On June 29, 2010, the Office of Air Quality (OAQ) received an application from the source for the changes listed in the attached Technical Support Document (TSD).

The source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised registration. A copy of the registration is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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)

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Bruce Farrar, at (800) 451-6027, press 0 and ask for Bruce Farrar or extension 4-5401, or dial (317) 234-5401.

Sincerely,

Iryn Galilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/bf

Attachment: Revised Registration and Technical Support Document

cc: File - Marion County  
Marion County Health Department  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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## REGISTRATION OFFICE OF AIR QUALITY

**North America Packaging Corporation  
6061 Guion Road  
Indianapolis, Indiana 46254**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R097-16528-00445	
Original signed by:  John B. Chavez Administrator Office of Environmental Services	Issuance Date: January 23, 2003

First Registration Notice-Only Change No. 097-22447-00445, issued on April 5, 2006

Second Registration Notice-Only Change No 097 - 29413 - 00445	
Issued by:  Iryn Callung, Section Chief Permits Branch Office of Air Quality	Issuance Date:  July 20, 2010

## SECTION A

## SOURCE SUMMARY

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

### A.1 General Information

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The Registrant owns and operates a stationary a polyethylene bottle manufacturing plant.

Source Address:	6061 Guion Road, Indianapolis, Indiana 46254
General Source Phone Number:	(317) 308-4076
SIC Code:	3081
County Location:	Marion County
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

### 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) screen printing operation, identified as Screen #1, constructed in 1980, with a maximum process rate of 125 bottles per hour.
- (b) Twenty-two (22) blow molders, identified as G #1,#2, #3, #4, #7, #10, #11, #12, #14, #16, #17, #18, constructed in 1980; #8, #19, #20, #21, #22, #23, #24, #25, #26, constructed in 2005; and #27 and #31 approved for construction in 2010. All blow molders have a total maximum capacity of 4,524.46 pounds of resin per hour.
- (c) Twenty-two (22) grinders, identified as G #1,#2, #3, #4, #7, #10, #11, #12, #14, #16, #17, #18, constructed in 1980; #8, #19, #20, #21, #22, #23, #24, #25, #26, constructed in 2005; and #27 and #31 approved for construction in 2010. All grinders have a total maximum capacity of 824.88 pounds of defective bottles per hour, each equipped with a cyclone that is considered integral to the process.
- (d) Twenty-two (22) natural gas-fired flame treaters, constructed in 1980, with a total maximum heat input of 0.62 MMBtu/hr.
- (e) Seven (7) plastic resin pellets storage silos, four (4) constructed in 1980 and three (3) constructed in 2006, each with a maximum capacity of 58,280 pounds of plastic resin pellets.

## SECTION B

## GENERAL CONDITIONS

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

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

### B.2 Effective Date of Registration [IC 13-15-5-3]

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Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

### B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of the fact that continuance of this registration is not consistent with purposes of this article.

### B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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- (a) All terms and conditions of permits established prior to Registration No. 097-16528-00445 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

### B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

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Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

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

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

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

**B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]**

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Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.7 Registrations [326 IAC 2-5.1-2(i)]**

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Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

**B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant 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 Registrant 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 Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.2 Fugitive Dust Emissions [326 IAC 6-4]

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

## SECTION D.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (b) Twenty-two (22) blow molders, identified as EM #1,#2, #3, #4, #7, #10, #11, #12, #14, #16, #17, #18, constructed in 1980; #8, #19, #20, #21, #22, #23, #24, #25, #26, constructed in 2005; and #27 and #31 approved for construction in 2010. All blow molders have a total maximum capacity of 4,524.46 pounds of resin per hour.
- (c) Twenty-two (22) grinders, identified as G #1,#2, #3, #4, #7, #10, #11, #12, #14, #16, #17, #18, constructed in 1980; #8, #19, #20, #21, #22, #23, #24, #25, #26, constructed in 2005; and #27 and #31 approved for construction in 2010. All grinders have a total maximum capacity of 824.88 pounds of defective bottles per hour, each equipped with a cyclone that is considered integral to the process.

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

### Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

#### D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the grinders and their control device. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

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

#### D.1.2 Particulate

Pursuant to 326 IAC 2-5.5 (Registrations), the cyclones associated with the grinders must be in operation at all times the grinders are in operation.

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

None.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

None.

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

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	North American Packaging Corporation
<b>Address:</b>	6061 Guion Road
<b>City:</b>	Indianapolis, Indiana 46254
<b>Phone Number:</b>	(317) 308-4076
<b>Registration No.:</b>	097-16528-00445

I hereby certify that North American Packaging Corporation is :

- still in operation.
- no longer in operation.

I hereby certify that North American Packaging Corporation is :

- in compliance with the requirements of Registration No. 097-16528-00445.
- not in compliance with the requirements of Registration No. 097-16528-00445.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Phone Number:</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>

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Registration Notice Only Change

#### Source Description and Location

<b>Source Name:</b>	<b>North American Packaging Corporation</b>
<b>Source Location:</b>	<b>6061 Guion Road, Indianapolis, IN 46254</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>3081</b>
<b>Registration No.:</b>	<b>R097-16258-00445</b>
<b>Registration Issuance Date:</b>	<b>January 29, 2003</b>
<b>Registration Notice Only Change No.:</b>	<b>097-29413-00445</b>
<b>Permit Reviewer:</b>	<b>Bruce Farrar</b>

On June 29, 2010, the Office of Air Quality (OAQ) received an application relating to construction and operation of two new blow molders and two new grinders. This additional equipment will add 0.07 tons per year of VOC emissions and 0.05 tons per year of particulate emissions. The addition of these units to the registration is considered a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified in 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12), respectively. The uncontrolled/unlimited potential to emit of the entire source will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1). No new state rules are applicable to this source. There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this notice-only change.

#### Existing Approvals

The source was issued Registration No. R097-16258-00445 on January 29, 2003. The source has since received Notice-Only Change No. R097-22447-0044, issued on April 5, 2006.

#### County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <sub>3</sub>	Attainment effective November 8, 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	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Marion County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
 Marion County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed Notice Only Change, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to NOC (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Screen Printing	-	-	-	-	-	1.84	-	0.016	Negl.
Blow Molders	1.18	1.18	1.18	-	-	0.79	-	0.011	Negl.
Grinders	4.49	4.49	4.49	-	-	-	-	-	-
Natural Gas Combustion	0.005	0.005	0.005	0.002	0.25	0.015	0.11	0.005	Negl.
<b>Total PTE of the Entire Source</b>	<b>5.67</b>	<b>5.67</b>	<b>5.67</b>	<b>0.002</b>	<b>0.27</b>	<b>2.64</b>	<b>0.11</b>	<b>0.032</b>	
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible These emissions are based upon Registration No.: R097-22447-0044, issued on April 5, 2006.									

**Description of Proposed Notice Only change**

The Office of Air Quality (OAQ) has reviewed an application, submitted by North American Packaging Corporation on June 29, 2010 relating to construction of two Blow Molder Machines, two grinders with

cyclones and one Natural Gas-fired Flame Treater. In addition, Blow Molding Machine, identified as EM-7 and Grinder, identified as G-7, have been removed.

The following is a list of the new emission units and pollution control devices:

- (a) Two (2) blow molders, identified as EM #27 and #31, approved for construction in 2010, with a maximum capacity of 206 and 252 pounds of bottles per hour, respectively.
- (b) Two (2) grinders, identified as G #27 and #31, approved for construction 2010, with a maximum capacity of 86.67 and 25.22 pounds of defective bottles per hour, respectively and each equipped with a cyclone that is integral to the process.
- (c) Two (2) natural gas-fired flame treaters, approved for construction in 2010, with a maximum heat input of 0.0387 MMBtu/hr, each.

#### **“Integral Part of the Process” Determination**

The cyclones for the new grinders, identified as G #27 and #31, approved for construction in 2010, are integral to the grinders, because the cyclones are similar to the cyclones for the grinders currently used. The determination for the cyclones for the grinders as integral was made pursuant to Registration No.: R097-16258-00445, issued on January 29, 2003.

The Registrant has submitted the following information to justify why the cyclones should be considered an integral part of the grinding process:

- (a) The cyclone is used to collect the plastic scraps after grinding the defective polyethylene bottles. The size of the ground plastic scraps are approximately 1/4 inch square.
- (b) The collection efficiency of each cyclone is greater than 99% and 100% of the collected plastic scraps are recycled back to the blow molding operations.
- (c) The grinding operation is configured such that the cyclones cannot be bypassed. Therefore, no grinding can occur without the cyclones in operation.

IDEM, OAQ has evaluated the justifications and agreed that the cyclones will be considered as an integral part of the grinding process. Therefore, the permitting level will be determined using the potential to emit after the cyclones. Operating conditions in the proposed permit will specify that these cyclones shall operate at all times when the grinders are in operation.

#### **Enforcement Issues**

There are no pending enforcement actions related to this Notice-Only Change.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

#### **Permit Level Determination – Registration Notice-Only Change**

The following table is used to determine the appropriate permit level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the proposed Notice-Only Change.

Process/ Emission Unit	PTE of Proposed Notice-Only Change (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Screen Painting	-	-	-	-	-	4.63	-	0.0008	Negl.
Blow Molders	0.51	0.51	0.51	-	-	0.74	-	0.003	Negl.
Grinders	0.02	0.02	0.02	-	-	-	-	-	-
Natural Gas Combustion	7.41E-03	0.03	0.03	0.002	0.39	0.02	0.33	0.01	Negl.
Total PTE of Proposed NOC	0.54	0.56	0.56	0.002	0.39	5.39	0.33	0.01	

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

This Registration is being revised through a Registration Notice Only Change pursuant to 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12).

**PTE of the Entire Source After Issuance of the Registration Notice-Only Change**

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

Process/ Emission Unit	Potential To Emit of the Entire Source with the NOC (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Screen Printing	-	-	-	-	-	<del>1.84</del> <b>4.63</b>	-	<del>0.016</del> <b>0.0008</b>	Negl.
Blow Molders	<del>1.18</del> <b>0.51</b>	<del>1.18</del> <b>0.51</b>	<del>1.18</del> <b>0.51</b>	-	-	<del>1.67</del> <b>0.74</b>	-	<del>0.011</del> <b>0.003</b>	Negl.
Grinders	<del>4.49</del> <b>0.02</b>	<del>4.49</del> <b>0.02</b>	<del>4.49</del> <b>0.02</b>	-	-	-	-	-	-
Natural Gas Combustion	<del>0.005</del> <b>7.41E-03</b>	<del>0.05</del> <b>0.03</b>	<del>0.05</del> <b>0.03</b>	0.002	<del>0.27</del> <b>0.39</b>	<del>0.015</del> <b>0.02</b>	<del>0.11</del> <b>0.33</b>	<del>0.005</del> <b>0.01</b>	Negl.
<b>Total PTE of Entire Source</b>	<del>5.67</del> <b>0.54</b>	<del>1.19</del> <b>0.56</b>	<del>1.19</del> <b>0.56</b>	0.002	<del>0.25</del> <b>0.39</b>	<del>3.52</del> <b>5.39</b>	<del>0.11</del> <b>0.33</b>	<del>3.48</del> <b>0.01</b>	
Registration Levels	25	25	25	25	25	25	100	25	10

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

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

Process/ Emission Unit	Potential To Emit of the Entire Source with the NOC (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Screen Printing	-	-	-	-	-	4.63	-	0.0008	Negl.
Blow Molders	0.51	0.51	0.51	-	-	0.74	-	0.003	Negl.
Grinders	0.02	0.02	0.02	-	-	-	-	-	-
Natural Gas Combustion	7.41E-03	0.03	0.03	0.002	0.39	0.02	0.33	0.01	Negl.
<b>Total PTE of Entire Source</b>	<b>0.54</b>	<b>0.56</b>	<b>0.56</b>	<b>0.002</b>	<b>0.39</b>	<b>5.39</b>	<b>0.33</b>	<b>0.01</b>	<b>-</b>
Registration Levels	25	25	25	25	25	25	100	25	10

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

- (a) This Notice-Only Change will not change the registration status of the source, because the PTE of all regulated criteria pollutants will still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This Notice-Only Change will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

**Federal Rule Applicability Determination**

The federal rules applicable to the existing emission units at this source will not change as a result of this Notice Only Change.

The federal rule applicability for this Notice Only Change is as follows:

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed Notice Only Change.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed Notice Only Change.

Compliance Assurance Monitoring (CAM)

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

### State Rule Applicability Determination

The state rules applicable to the existing emission units at this source will not change as a result of this Notice-Only Change.

The following state rules are applicable to the proposed Notice-Only Change:

- (a) 326 IAC 2-5.5 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed Notice-Only Change is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of 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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

#### Screen Printing Operation

- (f) 326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)  
The screen printing operation was constructed after January 1, 1980 and has the potential to emit VOC less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable. Any change or modification which may increase the potential VOC emissions from the screen printing operation to greater than twenty-five (25) tons per year must be approved by the OAQ and OES before any such change may occur.
- (g) 326 IAC 8-5-5 (Graphic Arts Operations)  
The printing operation is not subject to 326 IAC 8-5-5 because the source does not perform packaging rotogravure, publication rotogravure, or flexographic printing.

### Blow Molders

- (h) 326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)  
The two blow molders, identified as EM #27 and #31, were constructed after January 1, 1980 and the total potential to emit VOC from the molding operation is less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable. Any change or modification which may increase the potential VOC emissions from the molding operation to greater than twenty-five (25) tons per year must be approved by the OAQ before any such change may occur.
- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the blow molders are not subject to this rule because the potential emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.
- (j) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)  
The source is located in Marion County, but is not specifically listed in 326 IAC 6.5-6. Pursuant to 326 IAC 6.5-1-1(a), if the potential particulate emissions are greater than one hundred (100) tons per year and the actual emissions are greater ten (10) tons per year, the requirements of 326 6.5-1-2(a) apply. However, the blow molders potential particulate emissions are less than one hundred (100) tons per year and the actual emissions are less ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) do not apply.

### Grinders

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the grinders are not subject to this rule because the potential emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.
- (l) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)  
The source is located in Marion County, but is not specifically listed in 326 IAC 6.5-6. Pursuant to 326 IAC 6.5-1-1(a), if the potential particulate emissions are greater than one hundred (100) tons per year and the actual emissions are greater ten (10) tons per year, the requirements of 326 6.5-1-2(a) apply. However, the grinders potential particulate emissions are less than one hundred (100) tons per year and the actual emissions are less ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) do not apply.

The cyclones, which are integral to the process, shall operate at all times when the grinders are in operation.

<b>Proposed Changes</b>
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The following changes listed below are due to the proposed Notice-Only Change. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

#### 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) screen printing operation, identified as Screen #1, constructed in 1980, with a maximum process rate of 125 bottles per hour.
- (b) ~~Twenty-one (21)~~ **Twenty-two (22)** blow molders, identified as G #1,#2, #3, #4, #7, #10, #11, #12, #14, #16, #17, #18, constructed in 1980; ~~and #8, #19, #20, #21, #22, #23, #24, #25, #26, constructed in 2005;~~ **and #27 and #31 approved for construction in 2010.**

All blow molders have a total maximum capacity of ~~40,253~~ **4,524.46** pounds of resin per hour.

- (c) ~~Twenty-one (21)~~ **Twenty-two (22)** grinders, identified as G #1,#2, #3, #4, #7, #10, #11, #12, #14, #16, #17, #18, constructed in 1980; ~~and #8, #19, #20, #21, #22, #23, #24, #25, #26, constructed in 2005;~~ **and #27 and #31 approved for construction in 2010.** All grinders have a total maximum capacity of ~~4,025.3~~ **824.88** pounds of defective bottles per hour, each equipped with a cyclone that is considered integral to the process.
- (d) ~~Sixteen (16)~~ **Twenty-two (22)** natural gas-fired flame treaters, constructed in 1980, with a total maximum heat input of 0.62 MMBtu/hr.

## SECTION D.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (b) ~~Twenty-one (21)~~**Twenty-two (22)** blow molders, identified as G #1,#2, #3, #4, #7, #10, #11, #12, #14, #16, #17, #18, constructed in 1980; ~~and #8, #19, #20, #21, #22, #23, #24, #25, #26, constructed in 2005;~~ **and #27 and #31 approved for construction in 2010.** All blow molders have a total maximum capacity of ~~40,253~~ **4,524.46** pounds of resin per hour.
- (c) ~~Twenty-one (21)~~ **Twenty-two (22)** grinders, identified as G #1,#2, #3, #4, #7, #10, #11, #12, #14, #16, #17, #18, constructed in 1980; ~~and #8, #19, #20, #21, #22, #23, #24, #25, #26, constructed in 2005;~~ **and #27 and #31 approved for construction in 2010.** All grinders have a total maximum capacity of ~~4,025.3~~ **824.88** pounds of defective bottles per hour, each equipped with a cyclone that is considered integral to the process.

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

## Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 29, 2010.

The construction and operation of this proposed Notice-Only Change shall be subject to the conditions of the attached proposed Registration Notice-Only Change No. 097-29413-00445. The staff recommends to the Commissioner that this Registration Notice Only Change be approved.

## IDG Contact

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

**Appendix A: Emission Calculations  
Summary**

**Company Name: North American Packaging Corporation  
Address City IN Zip: 6061 Guion Road, Indianapolis, IN 46254  
Registration Number: 097-29413-00445  
Reviewer: Bruce Farrar  
Date: June29, 2010**

	PM	PM10	PM2.5*	SO2	NOx	VOC	CO	Combined HAPs	Single HAP
Screen Painting *	-	-	-	-	-	4.63	-	0.0008	negl.
Blow Molders *	0.51	0.51	0.51	-	-	0.74	-	0.003	negl.
Grinders *	0.02	0.02	0.02	-	-	-	-	-	-
National Gas-Fired Flame Treaters **	7.41E-03	0.03	0.03	2.34E-03	0.39	0.02	0.33	0.01	negl.
<b>Total</b>	<b>0.54</b>	<b>0.56</b>	<b>0.56</b>	<b>0.00</b>	<b>0.39</b>	<b>5.39</b>	<b>0.33</b>	<b>0.01</b>	

\*Assume PM = PM10 = PM2.5

\*\*Assume PM10 = PM2.5

**Appendix A: Emission Calculations**  
**VOC Emissions**  
**From the Screen Printing (Screen 1)**

**Company Name: North American Packaging Corporation**  
**Address City IN Zip: 6061 Guion Road, Indianapolis, IN 46254**  
**Registration Number: 097-29413-00445**  
**Reviewer: Bruce Farrar**  
**Date: June29, 2010**

Manufacturer	Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)
Fujifilm Sericol	Screen Ink	6.59	100.00%	0.0%	100.0%	400.0	0.0004	6.59	1.05	25.31	4.62
Sun Chemical	ET12 Retarder	7.95	100.00%	0.0%	100.0%	400.0	0.0000003	7.95	0.001	0.023	0.004
Camie-Campbell	Screen Opener	6.29	100.00%	0.0%	100.0%	400.0	0.0000007	6.29	0.002	0.04	0.008
<b>Total</b>	<b>Total</b>								<b>1.06</b>		<b>4.63</b>

**METHODOLOGY**

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (8760 hr/yr) \* (1 ton/2000 lbs)

**Appendix A: Emission Calculations  
HAP Emissions  
From the Screen Printing**

**Company Name: North American Packaging Corporation  
Address City IN Zip: 6061 Guion Road, Indianapolis, IN 46254  
Registration Number: 097-29413-00445  
Reviewer: Bruce Farrar  
Date: June29, 2010**

Manufacturer	Material	Density (Lb/Gal)	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Weight % Cumene	Cumene Emissions (tons/yr)	Weight % Xylene	Xylene Emissions (tons/yr)
Camie-Campbell	Screen Opener	6.29	400.0	0.0000007	5.00%	0.0004	5.00%	0.0004
<b>Total</b>	<b>Total</b>					<b>0.0004</b>		<b>0.0004</b>

**Total HAPs**

**0.0008 tons/yr**

**METHODOLOGY**

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) \* Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**VOC and Particulate Emissions**  
**Existing Blow Molders**

**Company Name: North American Packaging Corporation**  
**Address City IN Zip: 6061 Guion Road, Indianapolis, IN 46254**  
**Registration Number: 097-29413-00445**  
**Reviewer: Bruce Farrar**  
**Date: June29, 2010**

Unit ID	*Maximum Capacity (lbs/hour)	**VOC Emission Factor (lb/1,000,000 lbs)	PTE of VOC (lbs/hr)	PTE of VOC (ton/yr)	**PM/PM10 Emission Factor (lbs/1,000,000)	PTE of PM/PM10 (lbs/hr)	PTE of PM/PM10 (ton/yr)
B-01	113	37.15	0.0042	0.018	25.93	0.0029	0.013
B-02	113	37.15	0.0042	0.018	25.93	0.0029	0.013
B-03	86	37.15	0.0032	0.014	25.93	0.0022	0.010
B-04	170	37.15	0.0063	0.028	25.93	0.0044	0.019
B-08	55	37.15	0.0021	0.009	25.93	0.0014	0.006
B-10	83	37.15	0.0031	0.014	25.93	0.0022	0.009
B-12	47	37.15	0.0017	0.008	25.93	0.0012	0.005
B-14	242	37.15	0.0090	0.039	25.93	0.0063	0.027
B-16	70	37.15	0.0026	0.011	25.93	0.0018	0.008
B-17	98	37.15	0.0036	0.016	25.93	0.0025	0.011
B-11	866	37.15	0.0322	0.141	25.93	0.0224	0.098
B-18	345	37.15	0.0128	0.056	25.93	0.0090	0.039
B-19	201	37.15	0.0075	0.033	25.93	0.0052	0.023
B-20	345	37.15	0.0128	0.056	25.93	0.0090	0.039
B-21	242	37.15	0.0090	0.039	25.93	0.0063	0.028
B-22	252	37.15	0.0094	0.041	25.93	0.0065	0.029
B-23	252	37.15	0.0094	0.041	25.93	0.0065	0.029
B-24	119	37.15	0.0044	0.019	25.93	0.0031	0.014
B-25	113	37.15	0.0042	0.018	25.93	0.0029	0.013
B-26	252	37.15	0.0094	0.041	25.93	0.0065	0.029
<sup>a</sup> B-27	206	37.15	0.0077	0.034	25.93	0.0053	0.023
<sup>a</sup> B-31	252	37.15	0.0094	0.041	25.93	0.0065	0.029
<b>Total</b>	<b>4,524</b>			<b>0.74</b>			<b>0.51</b>

\* Maximum Capacity changed from lbs of Resin/hour to lbs of bottles/hr. Bottles are 100% Resin and maximum capacity is based on machine and bottle type.

\*\* Emission factors for VOC and PM are from "Development of Emission Factors for Polyethelene Processing"(1996), Journal of Air and Waste Management, Volume 46, pp 569-580. Assume all PM emissions equal to PM10 emissions.

E.F. of VOC (lb/1,000,000 lbs) = (m x t) + c, where: m=slope =0.27, t = temperature = 425F, c = y intercept = -77.6

E.F. of PM (lb/1,000,000 lbs) = (m x t) +y, where: m = slope =0.141, t = temperature = 425F, c = y intercept = -34.0

<sup>a</sup> Units approved for construction in 2010

**Methodology**

Potential to Emit (lbs/hr) = Max. Capacity (lbs/hr) x Emission Factor (lbs/1,000,000 lbs)

Potential to Emit (tons/yr) = Max. Capacity (lbs/hr) x Emission Factor (lbs/1,000,000 lbs) x 8760 hr/yr x 1 ton/2000 lbs

## Appendix A: Emissions Calculations

HAP Emissions  
Existing Blow Molders

Company Name: North American Packaging Corporation  
 Address City IN Zip: 6061 Guion Road, Indianapolis, IN 46254  
 Registration Number: 097-29413-00445  
 Reviewer: Bruce Farrar  
 Date: June29, 2010

Unit ID	*Maximum Capacity (lbs/hour)	**Formaldehyde Emission Factor (lb/1,000,000 lbs)	PTE of Formaldehyde (lbs/hr)	PTE of Formaldehyde (ton/yr)	**Acrolein Emission Factor (lb/1,000,000 lbs)	PTE of Acrolein (lbs/hr)	PTE of Acrolein (ton/yr)	**Acetaldehyde Emission Factor (lb/1,000,000 lbs)	PTE of Acetaldehyde (lbs/hr)	PTE of Acetaldehyde (ton/yr)	**Propionaldehyde Emission Factor (lb/1,000,000 lbs)	PTE of Propionaldehyde (lbs/hr)	PTE of Propionaldehyde (ton/yr)
B-01	113	0.06	0.0000	2.966E-05	0.02	2.790E-09	1.222E-08	0.05	5.644E-06	2.472E-05	0.02	2.257E-06	9.888E-06
B-02	113	0.06	0.0000	2.966E-05	0.02	2.790E-09	1.222E-08	0.05	5.644E-06	2.472E-05	0.02	2.257E-06	9.888E-06
B-03	86	0.06	0.0000	2.249E-05	0.02	1.603E-09	7.023E-09	0.05	4.278E-06	1.874E-05	0.02	1.711E-06	7.496E-06
B-04	170	0.06	0.0000	4.471E-05	0.02	6.339E-09	2.776E-08	0.05	8.506E-06	3.726E-05	0.02	3.403E-06	1.490E-05
B-08	55	0.06	0.0000	1.455E-05	0.02	6.714E-10	2.941E-09	0.05	2.768E-06	1.213E-05	0.02	1.107E-06	4.850E-06
B-10	83	0.06	0.0000	2.191E-05	0.02	1.522E-09	6.664E-09	0.05	4.168E-06	1.825E-05	0.02	1.667E-06	7.302E-06
B-12	47	0.06	0.0000	1.233E-05	0.02	4.819E-10	2.111E-09	0.05	2.346E-06	1.027E-05	0.02	9.382E-07	4.109E-06
B-14	242	0.06	0.0000	6.349E-05	0.02	1.278E-08	5.599E-08	0.05	1.208E-05	5.291E-05	0.02	4.832E-06	2.116E-05
B-16	70	0.06	0.0000	1.852E-05	0.02	1.087E-09	4.763E-09	0.05	3.523E-06	1.543E-05	0.02	1.409E-06	6.173E-06
B-17	98	0.06	0.0000	2.571E-05	0.02	2.097E-09	9.184E-09	0.05	4.892E-06	2.143E-05	0.02	1.957E-06	8.572E-06
B-11	866	0.06	0.0001	2.275E-04	0.02	1.641E-07	7.189E-07	0.05	4.329E-05	1.896E-04	0.02	1.731E-05	7.584E-05
B-18	345	0.06	0.0000	9.074E-05	0.02	2.611E-08	1.144E-07	0.05	1.726E-05	7.562E-05	0.02	6.906E-06	3.025E-05
B-19	201	0.06	0.0000	5.291E-05	0.02	8.877E-09	3.888E-08	0.05	1.007E-05	4.409E-05	0.02	4.027E-06	1.764E-05
B-20	345	0.06	0.0000	9.074E-05	0.02	2.611E-08	1.144E-07	0.05	1.726E-05	7.562E-05	0.02	6.906E-06	3.025E-05
B-21	242	0.06	0.0000	6.364E-05	0.02	1.284E-08	5.625E-08	0.05	1.211E-05	5.303E-05	0.02	4.843E-06	2.121E-05
B-22	252	0.06	0.0000	6.629E-05	0.02	1.393E-08	6.103E-08	0.05	1.261E-05	5.524E-05	0.02	5.045E-06	2.210E-05
B-23	252	0.06	0.0000	6.629E-05	0.02	1.393E-08	6.103E-08	0.05	1.261E-05	5.524E-05	0.02	5.045E-06	2.210E-05
B-24	119	0.06	0.0000	3.138E-05	0.02	3.123E-09	1.368E-08	0.05	5.971E-06	2.615E-05	0.02	2.388E-06	1.046E-05
B-25	113	0.06	0.0000	2.966E-05	0.02	2.790E-09	1.222E-08	0.05	5.644E-06	2.472E-05	0.02	2.257E-06	9.888E-06
B-26	252	0.06	0.0000	6.629E-05	0.02	1.393E-08	6.103E-08	0.05	1.261E-05	5.524E-05	0.02	5.045E-06	2.210E-05
<sup>a</sup> B-27	206	0.06	0.0000	5.414E-05	0.02	9.293E-09	4.071E-08	0.05	1.030E-05	4.511E-05	0.02	4.120E-06	1.805E-05
<sup>a</sup> B-31	252	0.06	0.0000	6.623E-05	0.02	1.391E-08	6.091E-08	0.05	1.260E-05	5.519E-05	0.02	5.040E-06	2.208E-05
<b>Total</b>	<b>4,524</b>			<b>0.0012</b>			<b>1.494E-06</b>			<b>0.0010</b>			<b>0.0004</b>

\* Maximum Capacity changed from lbs of Resin/hour to lbs of bottles/hr. Bottles are 100% Resin and maximum capacity is based on machine and bottle type.

\*\* Emission factors for VOC and PM are from "Development of Emission Factors for Polyethylene Processing"(1996), Journal of Air and Waste Management, Volume 46, pp 569-580. Assume all PM emissions equal to PM10 emissions.

E.F. of VOC (lb/1,000,000 lbs) = (m x t) + c, where: m=slope=0.27, t = temperature = 425F, c = y intercept = -77.6

E.F. of PM (lb/1,000,000 lbs) = (m x t) +y, where: m = slope =0.141, t = temperature = 425F, c = y intercept = -34.0

<sup>a</sup> Units approved for construction in 2010

## Methodology

Potential to Emit (lbs/hr) = Max. Capacity (lbs/hr) x Emission Factor (lbs/1,000,000 lbs)

Potential to Emit (tons/yr) = Max. Capacity (lbs/hr) x Emission Factor (lbs/1,000,000 lbs) x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Particulate Emissions**

**Company Name: North American Packaging Corporation  
Address City IN Zip: 6061 Guion Road, Indianapolis, IN 46254  
Registration Number: 097-29413-00445  
Reviewer: Bruce Farrar  
Date: June29, 2010**

**1. Process Description:**

There is one grinder associated with each blow molder, and one cyclone connected to each grinder. The grinding operation is used to reduce the defects to a size about 0.25 inches square. The plastic scraps are collected by a cyclone, and all the collected material is recycled back to the molding process.

\*Note: The primary purpose of the cyclone is to collect the plastic scraps for recycle, not to control pollution. In addition, no grinding can occur without that the cyclones are in operation. Therefore, these cyclones are considered integral parts of the grinders and the potential to emit PM/PM10 is calculated based on the emissions after the cyclone.

Unit ID	*Maximum Capacity of Blow Molders (lbs/hour)	<sup>α</sup> Potential Throughput of Grinders (lbs/hr)	<sup>β</sup> PM/PM10 Emission Factor (lbs/ton)	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	<sup>γ</sup> Controlled PTE of PM/PM10 (ton/yr)
G-01	113	11.29	0.62	0.003	0.015	0.0005
G-02	113	11.29	0.62	0.003	0.015	0.0005
G-03	86	8.56	0.62	0.003	0.012	0.0003
G-04	170	17.01	0.62	0.005	0.023	0.0007
G-08	55	5.54	0.62	0.002	0.008	0.0002
G-10	83	8.34	0.62	0.003	0.011	0.0003
G-12	47	4.69	0.62	0.001	0.006	0.0002
G-14	242	24.16	0.62	0.007	0.033	0.0010
G-16	70	7.05	0.62	0.002	0.010	0.0003
G-17	98	9.78	0.62	0.003	0.013	0.0004
G-11	866	86.57	0.62	0.027	0.118	0.0035
G-18	345	34.53	0.62	0.011	0.047	0.0014
G-19	201	20.13	0.62	0.006	0.027	0.0008
G-20	345	34.53	0.62	0.011	0.047	0.0014
G-21	242	24.22	0.62	0.008	0.033	0.0010
G-22	252	25.22	0.62	0.008	0.034	0.0010
G-23	252	25.22	0.62	0.008	0.034	0.0010
G-24	119	11.94	0.62	0.004	0.016	0.0005
G-25	113	11.29	0.62	0.003	0.015	0.0005
G-26	252	25.22	0.62	0.008	0.034	0.0010
<sup>δ</sup> G-27	<b>206</b>	<b>20.60</b>	<b>0.62</b>	<b>0.006</b>	<b>0.028</b>	<b>0.0008</b>
<sup>δ</sup> G-31	<b>252</b>	<b>25.20</b>	<b>0.62</b>	<b>0.008</b>	<b>0.034</b>	<b>0.0010</b>
<b>Total</b>	<b>4,272</b>	<b>427.18</b>		<b>0.13</b>	<b>0.580</b>	<b>0.0174</b>

<sup>α</sup> - Assume 10% scrap

<sup>β</sup> Emission factor from AP-42 Table 11.17-4 Scalping, Screen and Hammer Mill

<sup>γ</sup> Control efficiency of Cyclone 97%

<sup>δ</sup> Units approved for construction in 2010

**METHODOLOGY:**

Potential throughput of Grinder = Blow Molder Throughput \*10%

PM/PM10 Emissions (lbs/hour) = Grinder throughput (lbs per hour/2000) \* Emission factor (lbs/ ton)

PM/PM10 Emissions (tons/year) = Grinder PM/PM10 emissions (lbs/hour)\*8760 \* 1ton/2000lbs

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name: North American Packaging Corporation**

**Address City IN Zip: 6061 Guion Road, Indianapolis, IN 46254**

**Registration Number: 097-29413-00445**

**Reviewer: Bruce Farrar**

**Date: June29, 2010**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.9

7.8

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	7.41E-03	0.03	2.34E-03	0.39	0.02	0.33

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 8 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name: North American Packaging Corporation**

**Address City IN Zip: 6061 Guion Road, Indianapolis, IN 46254**

**Registration Number: 097-29413-00445**

**Reviewer: Bruce Farrar**

**Date: June29, 2010**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	8.186E-06	4.678E-06	2.924E-04	7.017E-03	1.325E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.949E-06	4.288E-06	5.457E-06	1.481E-06	8.186E-06

Methodology is the same as page 7.

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Jody Wood  
North America Packaging  
6061 Guion Rd  
Indianapolis, IN 46254

**DATE:** July 20, 2010

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

**SUBJECT:** Final Decision  
Registration - Notice-Only Change  
097 - 29413 - 00445

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:  
Adam Estes 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

# Mail Code 61-53

IDEM Staff	LPOGOST 7/20/2010 North America Packaging Corporation 097 - 29413 - 00445 /final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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1		Jody Wood North America Packaging Corporation 6061 Guion Rd Indianapolis IN 46254 (Source CAATS) Via confirmed delivery										
2		Marion County Health Department 3838 N. Rural St Indianapolis IN 46205-2930 (Health Department)										
3		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Ms. Jodi Perras Improving Kids Environment 1111 East 54th Street, Suite 212 Indianapolis IN 46220 (Affected Party)										
7		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
8		Adam Estes Cornerstone Environmental 880 Lennox Court Zionsville IN 46077 (Consultant)										
9		Steerling Impressions, Inc. 6109 Guion Road Indianapolis IN 46254 (Affected Party)										
10		S. Cohn & Sons, Inc. 6041 Guion Road Indianapolis IN 46254 (Affected Party)										
11		Brickyard Ceramics and Crafts 6060 Guion Road Indianapolis IN 46254 (Affected Party)										
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