



# 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, 2011

RE: Flexible Materials, Inc. / 019-30320-00048

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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**New Source Construction and Federally Enforceable  
State Operating Permit  
OFFICE OF AIR QUALITY**

**Flexible Materials, Inc.  
3101 Hamburg Pike  
Jeffersonville, Indiana 47130**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F019-30320-00048	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 29, 2011  Expiration Date: July 29, 2016

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary stationary thin wood veneer sheet surface coating facility.

Source Address:	3101 Hamburg Pike, Jeffersonville, Indiana 47130-9645
General Source Phone Number:	(812) 280-7000
SIC Code:	2499
County Location:	Clark
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paint spray booth, identified as 02, approved for construction in 2011, and exhausting to stack 01, consisting of:
  - (1) One (1) high volume low pressure (HVLP) spray application system, coating a maximum of 32 veneer sheets per hour, using Styro-Air Paint Arrestors for particulate matter overspray control;
  - (2) One (1) wipe staining, coating with a maximum capacity of 0.104 square feet of veneer sheets per hour, using Styro-air Paint Arrestors for particulate matter overspray control;
- (b) HD sanding area, identified as 10139 and 10404, approved for construction in 2011, with a baghouse identified as Baghouse 01;
- (c) Two (2) Costa sheet Sanding, identified as 10241 and 10212, one (1) DMC panel sanding, identified as 10411, one (1) Costa Panel sanding, identified as 10268, one (1) Panel Saw, identified as 10459, and one (1) Heeseman Polisher, identified at 10239, all approved for construction in 2011, with a baghouse identified as Baghouse 02.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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Insignificant activities consisting of the following:

- (1) On site fire and emergency response training approved by the department; and
- (2) paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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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 2-7) shall prevail.

### B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F019-30320-00048, 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.5 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.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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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.7 Severability [326 IAC 2-8-4(4)]**

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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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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

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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F019-30320-00048 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

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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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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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.6 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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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 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

#### **C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (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 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.

**Stratospheric Ozone Protection**

**C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint spray booth, identified as 02, constructed in 2001 and exhausting to stack 01, consisting of:
  - (1) One (1) high volume low pressure (HVLP) spray application system, coating a maximum of 32 veneer sheets per hour, using Styro-Air Paint arrestors for particulate matter overspray control;
  - (2) One (1) wipe staining, coating with a maximum capacity of 0.104 square feet of veneer sheets per hour, using Styro-air Paint Arrestors for particulate matter overspray control;

(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 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutant (HAP) Emission Limitations [326 IAC 2-8]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (a) The input of each single HAP to paint spray booth 02 shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (b) The input of combined HAPs to paint spray booth 02 shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of single HAPs and total HAPs to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.2 VOC Emission Limitations [326 IAC 8-7] [326 IAC 2-8-4]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties) not applicable, the input of VOC delivered to the applicators, including clean up solvents, in paint spray booth 02 shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, shall limit the source-wide VOC emissions to less than 10 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties) and 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.3 Particulate Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the paint spray booth 02 shall not exceed three-hundredths (0.03) per dry standard cubic foot (dscf) of outlet air.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan is required for the paint spray booth 02 and its control device. 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.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

---

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets". IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.6 Particulate Control

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In order to comply with Condition D.1.3, the Styro-Air Paint Arrestors used for particulate control shall be in operation at all times that the paint spray booth 02 is in operation and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

#### D.1.7 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (01) while the paint spray booth 02 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

#### D.1.8 Record Keeping Requirements

---

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP and VOC usage limits established in Conditions D.1.1 and D.1.2.
  - (1) The HAP content and the VOC content of each coating material and solvent used;
  - (2) The amount of coating material and solvent less water used on a monthly basis;
    - (A) Records shall include orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

- (B) Solvent usage records shall differentiate between those added to coating and those used a cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The input of the worst single HAP to paint spray booth 02, each month and each twelve (12) consecutive month period.
- (5) The input of Total HAPs to paint spray booth 02, each month and each twelve (12) consecutive month period.
- (6) The input of VOC to paint spray booth 02, each month and each twelve (12) consecutive month period.
- (7) Calendar dates covered in the compliance determination period:
  - (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and monthly inspections.
  - (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 and Condition D.1.2 shall be submitted using the reporting forms located at the end of this permit or their equivalent no later than 30 days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirement of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) woodworking center consisting of:
  - (1) HD sanding area, identified as 10139 and 10404, constructed in 2001, with a baghouse identified as Baghouse 01;
  - (2) Two (2) Costa sheet Sanding, identified as 10241 and 10212, one (1) DMC panel sanding, identified as 10411, one (1) Costa Panel sanding, identified as 10268, one (1) Panel Saw, identified as 10459, and one (1) Heeseman Polisher, identified at 10239, all approved for construction in 2011, with a baghouse identified as Baghouse 02.

(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 2-8-4(1)]

#### D.2.1 Particulate Emission Limitations [326 IAC 2-2] [326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, the Permittee shall comply with the following:

- (a) PM, PM10, and PM2.5 emissions from the woodworking center operations controlled by baghouse 01 shall each not exceed 7.00 pounds per hour.
- (b) PM, PM10, and PM2.5 emissions from the woodworking center operations controlled by baghouse 02 shall each not exceed 7.00 pounds per hour.

Compliance with these limits, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide total emissions of PM and PM10 to less than 250 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance with these limits, combined with the potential to emit PM2.5 from all other emission units at this source, shall limit the source-wide total emissions of PM2.5 to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

#### D.2.2 Particulate Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Emission Limitations), particulate matter emissions from the woodworking center operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and their control devices. 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.2.4 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses (01 and 02) for PM

/PM10/PM2.5 control shall in operation and control emissions from the woodworking center operations at all times that the woodworking center operations are in operation.

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notifications shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### **D.2.5 Visible Emissions Notations**

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- (a) Visible emissions notations of the woodworking center operation baghouse stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eight percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### **D.2.6 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking center operation. For sources capable of redirecting vents, a baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### **D.2.7 Parametric Monitoring**

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The Permittee shall record the pressure drop across the baghouses used in conjunction with the woodworking center operation, at least once per day when the woodworking center operation is in operations. When for any one reading, the pressure drop across the baghouses is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### D.2.8 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the woodworking operation. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### D.2.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking center operation baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) To document the compliance status with Condition D.2.7, the Permittee shall maintain weekly records of the pressure drop during normal operation when venting to the atmosphere. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the process did not operate that day).
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Flexible Materials, Inc.  
Source Address: 3101 Hamburg Pike, Jeffersonville, Indiana 47130-9645  
FESOP Permit No.: F019-30320-00048

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Flexible Materials, Inc.  
Source Address: 3101 Hamburg Pike, Jeffersonville, Indiana 47130-9645  
FESOP Permit No.: F019-30320-00048

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Flexible Materials, Inc.  
Source Address: 3101 Hamburg Pike, Jeffersonville, Indiana 47130-9645  
FESOP Permit No.: F019-30320-00048  
Facility: Paint Spray Booth 02  
Parameter: VOC input  
Limit: The input of VOC delivered to the applicators, including clean up solvents, in paint spray booth 02 shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Flexible Materials, Inc.  
 Source Address: 3101 Hamburg Pike, Jeffersonville, Indiana 47130-9645  
 FESOP Permit No.: F019-30320-00048  
 Facility: Paint Spray Booth 02  
 Parameter: Single HAP and Total HAP input  
 Limit: The input of each single HAP to paint spray booth 02 shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

The input of combined HAPs to paint spray booth 02 shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Total HAP	Single HAP	Total HAP	Single HAP	Total HAP

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Flexible Materials, Inc.  
Source Address: 3101 Hamburg Pike, Jeffersonville, Indiana 47130-9645  
FESOP Permit No.: F019-30320-00048

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Flexible Materials, Inc.  
3101 Hamburg Pike  
Jeffersonville, Indiana 47130-9645

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Flexible Materials, Inc., 3101 Hamburg Pike, Jeffersonville, Indiana 47130-9645, completed construction of the stationary thin wood veneer sheet surface coating facility on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on March 8, 2011 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F019-30320-00048, Plant ID No. 019-00048 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_

Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_

Name \_\_\_\_\_ (typed or printed)

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

Technical Support Document (TSD) for a New Source Construction  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

**Source Name:** Flexible Materials, Inc.  
**Source Location:** 3101 Hamburg Pike, Jeffersonville, Indiana 47130  
**County:** Clark  
**SIC Code:** 2499  
**Operation Permit No.:** F 019-30320-00048  
**Permit Reviewer:** Marcia Earl

On March 8, 2011, the Office of Air Quality (OAQ) received an application from Flexible Materials, Inc. related to the relocation and reconstruction of a previously permitted stationary thin wood veneer sheet surface coating facility at a new location with the construction of new equipment.

**Existing Approvals**

The source was originally permitted under F019-23100-00108, issued on May 1, 2007 to operate at 1202 Port Road, Jeffersonville, Indiana 47130. The source is relocating to 3101 Hamburg Pike, Jeffersonville, Indiana 46730. Therefore, the source is required to obtain a new Federally Enforceable State Operating Permit (FESOP) with a new source identification number for the new location.

**County Attainment Status**

The source is located in Clark 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>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. 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. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Clark 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  
Clark County has been classified as attainment or unclassifiable in Indiana for criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### **Fugitive Emissions**

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

### **Background and Description of Permitted Emission Units**

The source consists of the following permitted emission units:

- (a) One (1) paint spray booth, identified as 02, approved for construction in 2011, and exhausting to stack 01, consisting of:
- (1) One (1) high volume low pressure (HVLP) spray application system, coating a maximum of 32 veneer sheets per hour, using Styro-Air Paint Arrestors for particulate matter overspray control;
  - (2) One (1) wipe staining, coating with a maximum capacity of 0.104 square feet of veneer sheets per hour, using Styro-air Paint Arrestors for particulate matter overspray control;
- (b) HD sanding area, identified as 10139 and 10404, approved for construction in 2011, with a baghouse identified as Baghouse 01;

Insignificant activities consisting of the following:

- (1) On site fire and emergency response training approved by the department.
- (2) paved and unpaved roads and parking lots with public access.

### **Background and Description of New Emission Units**

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

- (c) Two (2) Costa sheet Sanding, identified as 10241 and 10212, one (1) DMC panel sanding, identified as 10411, one (1) Costa Panel sanding, identified as 10268, one (1) Panel Saw, identified as 10459, and one (1) Heeseman Polisher, identified at 10239, approved for construction in 2011, with a baghouse identified as Baghouse 02 to control particulate matter.

### **Enforcement Issues**

There are no pending enforcement actions related to this source.



Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP**
Total PTE of Entire Source	68.52	68.52	68.52	0.00	0.00	<10.00	0.00	<25.00	<10.00
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA
Paved Roads (fugitive)	0.08	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<p>* 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".</p> <p>** Surface Coating Operation has the potential to emit greater than ten (10) tons each of Xylene and Toluene. The source will limit the material usage of the coating, which will limit the source-wide single HAP to less than ten (10) per year.</p>									

- (a) FESOP Status, Prevention of Significant Deterioration (PSD), and Nonattainment New Source Review Applicability  
 This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is being limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).
- (1) In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:
- (A) The input of each single HAP to paint spray booth 02 shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and
  - (B) The input of combined HAPs to paint spray booth 02 shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of single HAPs and total HAPs to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.
- (2) In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (A) The input of VOC delivered to the applicators, including clean up solvents, in paint spray booth 02 shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

- (3) In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, the Permittee shall comply with the following:

- (A) PM, PM10, and PM2.5 emissions from the woodworking center operations controlled by baghouse 01 shall each not exceed 7.00 pounds per hour.
- (B) PM, PM10, and PM2.5 emissions from the woodworking center operations controlled by baghouse 02 shall each not exceed 7.00 pounds per hour.

Compliance with these limits, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide total emissions of PM and PM10 to less than 250 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance with these limits, combined with the potential to emit PM2.5 from all other emission units at this source, shall limit the source-wide total emissions of PM2.5 to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

- (b) **PSD Minor Source**  
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM and PM10 are each limited to less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) **Emission Offset Minor Source**  
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM2.5), is limited to less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (40 CFR 60.310 through 60.316) (326 IAC 12), are not included in the permit, since the source does not coat metal furniture. This source coats thin wood veneer sheets.
- (b) There are no other 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) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (63.800 through 63.808) (326 IAC 20-14), are not included in this permit, since this source has taken a limit to control single HAP emissions to less than 10 tons per year and total HAP emission to less than 25 tons per year, and therefore is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (63.4670 through 63.4781) (326 IAC 20-79), are not included in this permit, since this source has taken a limit to control single HAP emissions to less than 10 tons per year and total HAP emissions to less than 25 tons per year, so this source is not a major source of HAPs
- (e) The requirements of the national Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63, Subpart HHHHHH (63.11169 through 63.11180) (326 IAC 20), are not included in this permit, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipments, and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates.
- (f) There are no other 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)

- (g) 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.

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

326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

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

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)

326 IAC 2-3 (Emission Offset) and Nonattainment New Source Review applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

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

The unlimited potential to emit of HAPs from the entire source is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the paint spray booth to 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. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

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.

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.

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is located in Clark County, Jeffersonville Township, was constructed after December 13, 1985, and does not have the potential to emit equal to or greater than 25 tons per year of fugitive particulate emissions. Therefore, the source is not subject to the requirements of 326 IAC 6-5.

Paint Spray Booth

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), this rule shall not apply if a facility is subject to a particulate matter limitation established in 326 IAC 6.5 that is more stringent than the particulate limitation under 326 IAC 6-3. Paint spray booth 02 is subject to the requirements of 326 IAC 6.5; therefore, the requirements of 326 IAC 6-3 are not applicable to this source.

326 IAC 6.5-1-2 (Particulate Emission Limitations)

This source is subject to the requirements of 326 IAC 6.5-1-2(a), since it is located in Clark County and has the potential to emit (PTE) greater than one-hundred (100) tons of particulate matter per year, but is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the paint spray booth 02 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf) of outlet air. In order to comply with this limit, the Styrop-Air Paint Arrestors for particulate control shall be in operation at all times that the paint spray booth 02 is in operation.

326 IAC 6.8 (Particulate Matter Limitations For Lake County)

This source has the potential to emit (PTE) of particulate matter greater than 100 tons per year and is located in Clark County. Therefore, 326 IAC 6.8 is not applicable to this source.

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

The unrestricted potential to emit (PTE) VOC from the paint spray booth 02 is greater than 25 tons per year. Pursuant to 326 IAC 8-1-6(3)(A), the paint spray booth 02 is not subject the requirements of 326 IAC 8-1-6, because the paint spray booth would have otherwise been regulated by the provisions of 326 IAC 8-7 (Specific VOC reduction Requirements for Lake,

Porter, Clark and Floyd Counties. However the source has limited the input of VOC to the paint spray booth to less than 10 tons per twelve (12) consecutive month period in order to render 326 IAC 8-7 not applicable (see below section entitled 326 IAC 8-7 - Specific VOC reduction Requirements for Lake, Porter, Clark and Floyd Counties).

326 IAC 8-2-6 (Metal furniture coating operations)

This source is not subject to this rule, because it does not coat metal furniture. This source coats wood veneer sheets.

326 IAC 8-2-9 (Miscellaneous metal and plastic parts coating operations)

This source is not subject to this rule, because it does not coat metal or plastic parts. This source coats wood veneer sheets.

326 IAC 8-2-10 (Flat wood panels; manufacturing operations)

- (a) This source is not subject to 326 IAC 8-2-10(a)(1), because this source does not manufacture printed interior panels made of hardwood plywood and thin particle board. This source manufactures wood veneer sheet.
- (b) This source is not subject to 326 IAC 8-2-10(a)(2) because this source does not manufacture natural finish hardwood plywood panels. This source manufactures wood veneer sheet.
- (c) This source is not subject to 326 IAC 8-2-10(a)(3), because this source does not manufacture hardboard paneling with Class II finishes. This source manufactures wood veneer sheet.
- (d) This source is not subject to 326 IAC 8-2-10(a)(4), because this source does not manufacture exterior siding. This source manufactures wood veneer sheet.
- (e) This source is not subject to 326 IAC 8-2-10(a)(5), because this source does not manufacture tileboard. This source manufactures wood veneer sheet.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The spray booth is not subject to this rule, because it coats thin veneer sheets which are not considered furnishings.

326 IAC 8-7 (Specific VOC reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The potential to emit (PTE) VOC from the source are greater than 100 tons per year and the potential to emit (PTE) VOC from paint spray booth 02 are greater than 10 tons per year. The source would have been subject to the provisions of 326 IAC 8-7. However, in order to render the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties) not applicable, the source shall comply with the following:

The input of VOC delivered to the applicators, including clean up solvents, in paint spray booth 02 shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Woodworking Center Operation

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), this rule shall not apply if a facility is subject to a particulate matter limitation established in 326 IAC 6.5 that is more stringent than the particulate limitation under 326 IAC 6-3. The woodworking center operation is subject to the requirements of 326 IAC 6.5; therefore, the requirements of 326 IAC 6-3 are not applicable to this operation.

326 IAC 6.8 (Particulate Matter Limitations For Lake County)

This source has the potential to emit (PTE) of particulate matter greater than 100 tons per year and is located in Clark County. Therefore, 326 IAC 6.8 is not applicable to this source.

326 IAC 6.5-1-2 (Particulate Emission Limitations Except Lake County)

This source is subject to the requirements of 326 IAC 6.5-1-2(a), since it is located in Clark County and has the potential to emit (PTE) greater than one-hundred tons of particulate matter per year, but is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Pursuant to 326 IAC 6.5-1-2(a) (Particulate Emission Limitations), particulate matter emissions from the woodworking center operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot. The baghouses (01 and 02) for particulate control shall be in operation and control emissions from the woodworking center operations at all times the woodworking center operations are in operation in order to comply with 326 IAC 6.5-1-2.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

**Compliance Determination, Monitoring and Testing Requirements**

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

<b>Emission Unit/Control</b>	<b>Parameters</b>	<b>Frequency</b>	<b>Excursions and Exceedances</b>
Woodworking Operation/Baghouse 01 and 02	Visible Emissions	Daily	Response Steps
	Baghouse Inspections	Quarterly	
	Parametric Monitoring	Daily	
Paint Spray Booth/Styro-Air Paint Arrestors	Filter inspection	Daily	Response Steps
	Overspray	Weekly	
	Overspray	Monthly	

- (b) There are no testing requirements applicable to this source.

**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 March 8, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F019-30320-00048. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Marcia Earl 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) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (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.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emission Summary**

**Company Name:** Flexible Materials, Inc.  
**Address City IN Zip:** 3101 Hamburg Pike, Jeffersonville, Indiana 47130  
**Permit Number:** F019-30320-00048  
**Permit Reviewer:** Marcia Earl  
**Date:** March 2011

**Unlimited Potential to Emit (Before Controls)**

Emission Units	PM	PM10	PM2.5	SO2	VOC	CO	NOx	Total HAPs	Worst Case Single HAP
Surface Coating	7.20	7.20	7.20	0.00	118.26	0.00	0.00	47.08	33.51 (xylene)
Woodworking*	1143.37	1143.37	1143.37	0.00	0.00	0.00	0.00	0.00	0.00 ---
<b>Total Non-Fugitive Emissions***</b>	<b>1150.57</b>	<b>1150.57</b>	<b>1150.57</b>	<b>0.00</b>	<b>118.26</b>	<b>0.00</b>	<b>0.00</b>	<b>47.08</b>	<b>33.51 (xylene)</b>
Paved Roads (fugitive)	0.08	0.02	0.004	0.00	0.00	0.00	0.00	0.00	0.00 ---
<b>Total Fugitive Emissions</b>	<b>0.08</b>	<b>0.02</b>	<b>0.004</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b> ---

\*For purposes of determining the applicability of Prevention of Significant Deterioration (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), potential particulate matter emissions from the woodworking operations were calculated before consideration of the baghouse controls

**Unlimited Potential to Emit (After Integral Controls)**

Emission Units	PM	PM10	PM2.5	SO2	VOC	CO	NOx	Total HAPs	Worst Case Single HAP
Surface Coating	7.20	7.20	7.20	0.00	118.26	0.00	0.00	47.08	33.51 (xylene)
Woodworking**	2.86	2.86	2.86	0.00	0.00	0.00	0.00	0.00	0.00 ---
<b>Total Non-Fugitive Emissions***</b>	<b>10.06</b>	<b>10.06</b>	<b>10.06</b>	<b>0.00</b>	<b>118.26</b>	<b>0.00</b>	<b>0.00</b>	<b>47.08</b>	<b>33.51 (xylene)</b>
Paved Roads (fugitive)	0.08	0.02	0.004	0.00	0.00	0.00	0.00	0.00	0.00 ---
<b>Total Fugitive Emissions</b>	<b>0.08</b>	<b>0.02</b>	<b>0.004</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b> ---

\*\*Potential particulate matter emissions from the woodworking operations (sanders, polisher, and panel saw) were calculated after consideration of the baghouse controls for purposes of determining permit level.

**Limited Potential to Emit**

Emission Units	PM	PM10	PM2.5	SO2	VOC	CO	NOx	Total HAPs	Worst Case Single HAPs
Surface Coating	7.20	7.20	7.20	0.00	<10.00	0.00	0.00	<25.00	<10.00
Woodworking**	61.32	61.32	61.32	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Non-Fugitive Emissions***</b>	<b>68.52</b>	<b>68.52</b>	<b>68.52</b>	<b>0.00</b>	<b>&lt;10.00</b>	<b>0.00</b>	<b>0.00</b>	<b>&lt;25.00</b>	<b>&lt;10.00</b>
Paved Roads (fugitive)	0.08	0.02	0.004	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Fugitive Emissions</b>	<b>0.08</b>	<b>0.02</b>	<b>0.004</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

\*\*Limited PTE to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

\*\*\*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 and Part 70 Permit applicability.

**Appendix A: Emissions Calculations  
Paint Booth 02  
VOC and Particulate**

**Company Name:** Flexible Materials, Inc.  
**Address City IN Zip:** 3101 Hamburg Pike, Jeffersonville, Indiana 47130  
**Permit Number:** F019-30320-00048  
**Permit Reviewer:** Marcia Earl  
**Date:** March 2011

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Chadwood Wiping Stain	6.66	93.00%	0.0%	93.0%	0.0%	3.79%	1.000	0.10428	6.19	6.19	0.65	15.50	2.83	0.00	163.42	100%
Vinyl Sealer	7.16	76.00%	0.0%	76.0%	0.0%	13.28%	2.600	0.10428	5.44	5.44	1.48	35.41	6.46	0.00	40.98	100%
Durasyn Topcoat	7.41	66.00%	0.0%	66.0%	0.0%	26.28%	2.900	0.10428	4.89	4.89	1.48	35.50	6.48	0.00	18.61	100%
Conversion Varnish	7.848	69.60%	0.0%	69.6%	0.0%	30.40%	0.086	32.0	5.46	5.46	15.03	360.77	65.84	7.19	17.97	75%
Wipe Stains	7.284	99.90%	0.0%	99.9%	0.0%	0.40%	0.046	25.0	7.28	7.28	8.37	200.84	36.65	0.01	1819.18	75%
<b>Totals</b>											<b>27.00</b>	<b>648.01</b>	<b>118.26</b>	<b>7.20</b>		

Controlled Potential Emissions		
Control Efficiency:		Controlled PM tons/yr
VOC	PM	
0.00%	99.00%	0.072

**METHODOLOGY**

Pounds of VOC per Gallon coating less Water = Density (lb/gal) \* (Weight % Organics) / (1-Volume %water)  
Pounds of VOC per Gallon Coating = Density (lb/gal) \* Weight % Organics  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum units/hr \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Potential Particulate Tons per Year = Density (lb/gal) \* [1 - Weight % Volatile (H2O & Organics)] \* Gal of Material (gal/unit) \* Maximum (units/hr) \* [1 - Transfer Efficiency] \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = Density (lbs/gal) \* Weight % Organics / Volume % solids  
Controlled PM (tons/yr) = [Particulate Potential (tons/yr)] \* [1 - control efficiency]

**Appendix A: Emission Calculations  
Paint Booth 02  
HAP Emission Calculations**

**Company Name:** Flexible Materials, Inc.  
**Address City IN Zip:** 3101 Hamburg Pike, Jeffersonville, Indiana 47130  
**Permit Number:** F019-30320-00048  
**Permit Reviewer:** Marcia Earl  
**Date:** March 2011

**Uncontrolled/Unlimited Potential to Emit (PTE)**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % Methanol	Uncontrolled/Unlimited Potential to Emit				
									Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethylbenzene Emissions (tons/yr)	Methanol Emissions (ton/yr)
Chadwood Wiping Stain	6.66	1.000	0.10428	0.00%	15.00%	0.00%	0.00%	7.00%	0.00	0.46	0.00	0.00	0.21
Vinyl Sealer	7.16	2.600	0.10428	0.00%	10.00%	1.00%	1.00%	0.00%	0.00	0.85	0.09	0.09	0.00
Durasyn Topcoat	7.41	2.900	0.10428	5.00%	5.00%	1.00%	0.00%	0.00%	0.49	0.49	0.10	0.00	0.00
Conversion Varnish	7.848	0.086	32.0	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	9.46	0.00	0.00	0.00
Wipe Stains	7.284	0.046	25.0	90.00%	0.00%	0.00%	5.00%	0.00%	33.02	0.00	0.00	1.83	0.00
<b>Totals</b>									<b>33.51</b>	<b>11.26</b>	<b>0.18</b>	<b>1.92</b>	<b>0.21</b>

**Uncontrolled/Unlimited PTE of Total HAPs:** 47.08

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Limited Potential to Emit (PTE)**

**Material Usage Reduction Limitation =** 29.54%

Limited Potential to Emit				
Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethylbenzene Emissions (tons/yr)	Methanol Emissions (ton/yr)
<b>9.90</b>	<b>3.33</b>	<b>0.05</b>	<b>0.57</b>	<b>0.06</b>

**Limited PTE of Total HAPs:** 13.91

**METHODOLOGY**

HAPS emission rate (tons/yr = Density (lb/gal) \* Gal of Material (gal/unit) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs \* Material Usage Reduction Limitation (%)

**Appendix A: Emission Calculations  
Sanding and Woodworking Operation**

**Company Name:** Flexible Materials, Inc.  
**Address City IN Zip:** 3101 Hamburg Pike, Jeffersonville, Indiana 47130  
**Permit Number:** F019-30320-00048  
**Permit Reviewer:** Marcia Earl  
**Date:** March 2011

Baghouse 01	Max Wood Removal (inches)	Product Width (inches)	Max Feed (FPM) w/ roll changes	Cu Ft Removed Per Min	Lbs/CuFt	Lbs/Min	Lbs/Hr	Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)	Control Efficiency	Controlled PTE of PM/PM10/PM2.5 (tons/yr)
10139 3 HD Sand	0.004	9.5	57.7	0.02	45	0.7	41.1	180	99.75%	4.50E-01
10404 4 HD Sand	0.008	9.5	57.7	0.03	45	1.4	82.2	360	99.75%	0.90
<b>Totals</b>								540		1.35

Feed speed of 75 fpm for 500 ft, then a change over of 2 minutes, = 57.7 fpm

**Baghouse 01 Grains / CFM Outlet Calculation**

Max Fed to Baghouse 540.2 lbs/hr  
 60 min / hr 9.0 lbs/min  
 @ 17288 cfm 0.000521 lbs/cfm  
 @ 7000 grains / lb 3.65 grains/cfm  
 @ 99.75% filtration 0.0091 grains/cfm outlet

Baghouse 02	Max Wood Removal (inches)	Max Width (inches)	Max Feed 8' pcs per 8 hr shift	Cu Ft Removed Per Min	Lbs/CuFt	Lbs/Min	Lbs/Hr	Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)	Control Efficiency	Controlled PTE of PM/PM10/PM2.5 (tons/yr)
10241 Costa Sheet Sand	0.005	49	368	0.010	45	0.5	28.2	123.41	99.75%	0.31
10212 Costa Sheet Sand	0.005	49	368	0.010	45	0.5	28.2	123.41	99.75%	0.31
10411 DMC Panel Sand	0.005	49	350	0.010	45	0.4	26.8	117.37	99.75%	0.29
10268 Costa Panel Sand	0.005	61	350	0.012	45	0.6	33.4	146.11	99.75%	0.37
10239 Heeseman Polisher	0.003	61	89	0.002	45	0.1	5.1	22.29	99.75%	0.06
10459 Panel Saw	11/16	3/16	400	0.006	45	0.3	16.1	70.58	99.75%	0.18
<b>Totals</b>								603.17		1.51

<b>Total PTE from Baghouses 01 and 02</b>	<b>1143.4</b>	<b>2.86</b>
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**Baghouse 02 Grains / CFM Outlet Calculation**

Max Fed to Baghouse 603.2 lbs/hr  
 60 min / hr 10.1 lbs/min  
 @ 33000 cfm 0.000305 lbs/cfm  
 @ 7000 grains / lb 2.13 grains/cfm  
 @ 99.75% filtration 0.0053 grains/cfm outlet

**Limited Potential to Emit**

Control Device	Limited PTE of PM/PM10/PM2.5 (lbs/hr)	Limited PTE of PM/PM10/PM2.5 (tons/yr)
Baghouse 01	7.00	30.66
Baghouse 02	7.00	30.66
<b>Totals</b>	<b>14.00</b>	<b>61.32</b>

**METHODOLOGY**

Cubic Foot Removed per Minute = Maximum Wood Removal (inches) \* Product Width (inches) \* Maximum Feed (FPM) with roll changes \* 12 / (12\*12\*12)  
 Pounds (lbs) of material removed per minute = Cubic Foot Removed per minute \* Pounds (lbs) per cubic foot  
 Pounds (lbs) of material removed per hour = Pounds (lbs) of material removed per minute \* 60 (min)  
 Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr) = [Pounds (lbs) of material removed per hour] \* [8760 hours/year] \* [ton/2000 lbs]  
 Controlled PTE of PM/PM10/PM2.5 (tons/yr) = [Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)] \* [1 - Control Efficiency]

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name:** Flexible Materials, Inc.  
**Source Address:** 3101 Hamburg Pike, Jeffersonville, Indiana 47130  
**Permit Number:** F019-30320-00048  
**Reviewer:** Marcia Earl  
**Date:** March 2011

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	10.0	1.0	10.0	29.0	290.0	600	0.114	1.1	414.8
Vehicle (leaving plant) (one-way trip)	10.0	1.0	10.0	29.0	290.0	600	0.114	1.1	414.8
<b>Total</b>			<b>20.0</b>		<b>580.0</b>			<b>2.3</b>	<b>829.5</b>

Average Vehicle Weight Per Trip = 29.0 tons/trip  
 Average Miles Per Trip = 0.11 miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	29.0	29.0	29.0	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	0.214	0.043	0.0105	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	0.196	0.039	0.0096	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

\*\*All loads covered

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
	<b>0.09</b>	<b>0.02</b>	<b>0.00</b>	<b>0.08</b>	<b>0.02</b>	<b>0.00</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)



# 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: Ronald Weldon  
Flexible Materials, Inc.  
3101 Hamburg Pike  
Jeffersonville, IN 47130

DATE: July 29, 2011

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

SUBJECT: Final Decision  
New Source Construction & Federally Enforceable State Operating Permit  
019-30320-00048

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:  
Chris Brown – VP Engineering  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 29, 2011

TO: Jeffersonville Township Public Library

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

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

**Applicant Name: Flexible Materials, Inc.**  
**Permit Number: 019-30320-00048**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	GHOTOPP 7/29/2011 Flexible Materials, Inc 019-30320-00048 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		Ronald Weldon Flexible Materials, Inc 3101 Hamburg Pike Jeffersonville IN 47130 (Source CAATS) via confirmed delivery										
2		Chris Brown VP Engineering Flexible Materials, Inc 1202 Port Rd Jeffersonville IN 47130 (RO CAATS)										
3		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
4		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
5		Mrs. Sandy Banet 514 Haddox Rd Henryville IN 47126 (Affected Party)										
6		Jeffersonville Twp Public 211 E Court Ave, P.O. Box 1548 Jeffersonville IN 47131-1548 (Library)										
7		Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)										
8		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
9		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
10												
11												
12												
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<b>8</b>			