



# 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: November 1, 2011

RE: MPI Release Technologies / 059 - 30592 - 00023

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

## Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days 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  
FN-REGIS.dot 1/2/08



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## REGISTRATION OFFICE OF AIR QUALITY

**MPI Release Technologies, LLC**  
2162 Hastings Blvd.,  
Greenfield, Indiana 46140

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

Registration No. R059-30592-00023	
Issued by:  Iryn Callifung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 1, 2011

## SECTION A

## SOURCE SUMMARY

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

### A.1 General Information

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The Registrant owns and operates a stationary paper coating and metalizing plant.

Source Address:	2162 Hastings Blvd., Greenfield, Indiana 46140
General Source Phone Number:	(781) 729-8300
SIC Code:	2672
County Location:	Hancock County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

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

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

The source consists of the following existing emission unit(s):

- (a) Two (2) natural gas-fired drying ovens, each constructed in 1995, rated at 7.9 and 12.9 MMBtu per hour, respectively, both exhausting to stack T-Damper.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas fired flame treater rated at 1.7 MMBtu per hour; and
  - (2) One (1) air make-up unit with a heat input capacity of 5.5 MMBtu/hr.
- (c) Closed loop heating and cooling systems;
- (d) Natural draft noncontact cooling tower not regulated under a NESHAP;
- (e) Paved and unpaved roads and parking lots with public access; and
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps.

## **SECTION B GENERAL CONDITIONS**

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

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

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

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

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

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

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

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

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- (a) All terms and conditions of permits established prior to Registration No. R059-30592-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

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

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

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

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

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

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

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

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

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

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

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- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Registrant shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

**C.2 Fugitive Dust Emissions [326 IAC 6-4]**

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

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

**REGISTRATION  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	MPI Release Technologies, LLC
<b>Address:</b>	2162 Hastings Blvd.,
<b>City:</b>	Greenfield, Indiana source 46140
<b>Phone Number:</b>	(781) 729-8300
<b>Registration No.:</b>	R059-30592-00023

- I hereby certify that MPI Release Technologies, LLC is :  still in operation.  
 no longer in operation.
- I hereby certify that MPI Release Technologies, LLC is :  in compliance with the requirements of Registration No. R059-30592-00023.  
 not in compliance with the requirements of Registration No. R059-30592-00023.

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

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

<b>Noncompliance:</b>

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

**Technical Support Document (TSD) for a Part 70 Operating Permit  
Transitioning to a Registration**

**Source Description and Location**

**Source Name:** MPI Release Technologies, LLC  
**Source Location:** 2162 Hastings Blvd., Greenfield, IN 46140  
**County:** Hancock  
**SIC Code:** 2672  
**Registration No.:** R059-30592-00023  
**Permit Reviewer:** Charles Sullivan

The source has been operating under Part 70 Operating Permit Renewal (Title V) No. T059-17598-00023, issued on March 2, 2007. Due to the elimination of a production level polytype paper coater operations from the site and the subsequent removal of support equipment, the source is transitioning from a Title V to a Registration. On May 31, 2011, the Office of Air Quality (OAQ) received an application from MPI Release Technologies, LLC related to the transition from a Part 70 Operating Permit to a Registration.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Title V No. T059-7996-00023, issued on January 19, 1999
- (b) Title V Renewal No. T059-17598-00023, issued on March 2, 2007
- (c) Title V Administrative Amendment No. 059-28179-00023, issued on July 22, 2009
- (d) Title V Administrative Amendment No. 059-29315-00023, issued on June 23, 2010

Due to this application, the source is transitioning from a Part 70 Operating Permit to a Registration.

**County Attainment Status**

The source is located in Hancock County.

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

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

- (b) Hancock County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Other Criteria Pollutants  
Hancock County has been classified as attainment or unclassifiable in Indiana for all pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### **Fugitive Emissions**

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.5 (Registrations) applicability.

### **Background and Description of Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by MPI Release Technologies, LLC on May 31, 2011, relating to the transition of their Part 70 Operating Permit to a Registration.

The source consists of the following existing emission units:

- (a) Two (2) natural gas-fired drying ovens, each constructed in 1995, rated at 7.9 and 12.9 MMBtu per hour, respectively, both exhausting to stack T-Damper.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) One (1) natural gas fired flame treater rated at 1.7 MMBtu per hour; and
  - (2) One (1) air make-up unit with a heat input capacity of 5.5 MMBtu/hr.
- (c) Closed loop heating and cooling systems;
- (d) Natural draft noncontact cooling tower not regulated under a NESHAP;
- (e) Paved and unpaved roads and parking lots with public access; and
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps.

### **Emission Units and Pollution Control Equipment Removed From the Source**

The source has removed the following emission units:

- (a) One (1) polytype paper coater, installed in November of 1996, with a maximum processing rate of 394 units of metallized paper per hour;
- (b) One (1) natural gas fired regenerative thermal oxidizer, installed in November of 1996, equipped with two (2) burners each rated at 18.8 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, for controlling the paper coater volatile organic compounds (VOC) emissions; and
- (c) Solvent recycling systems with batch capacity less than or equal to 100 gallons;

- (d) Natural draft noncontact cooling towers not regulated under a NESHAP;  
 (One cooling tower remains)
- (e) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (f) Other categories with emissions below insignificant thresholds:  
 Metallizer equipped with in-line filters for emissions control;
- (g) Drum Mixer in the mix room, vented to the thermal oxidizer

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination –Registration**

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Natural Gas Combustion (Dryer Oven 1 & 2, Flame treater, Air Make-up)	0.23	0.93	0.93	0.07	12.26	0.67	10.30	14,806	0.23	0.22 (Hexane)
Fugitive Emissions (Paved Roads)	0.11	0.02	0.02	--	--	--	--	--	--	--
<b>Total PTE of Entire Source</b>	<b>0.34</b>	<b>0.95</b>	<b>0.95</b>	<b>0.07</b>	<b>12.26</b>	<b>0.67</b>	<b>10.30</b>	<b>14,806</b>	<b>0.23</b>	<b>0.22 (Hexane)</b>
Exemptions Levels**	5	5	5	10	10	5 or 10	25	100,000	25	10
Registration Levels**	25	25	25	25	25	25	100	100,000	25	10

negl. = negligible  
 \*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

**Criteria Pollutants (PM10, PM2.5, SO2, NOx, VOC, and CO)**

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of NO<sub>x</sub> are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.

### **Hazardous Air Pollutants**

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

### **Greenhouse Gases (GHGs) as CO<sub>2</sub>e**

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

<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 Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (60.40c through 60.48c) (326 IAC 12), are not included in this permit, because:
- (1) the two (2) natural gas-fired drying ovens rated at 7.9 and 12.9 MMBtu per hour, respectively, both exhausting through a T-Damper are not steam generating units;
  - (2) the one (1) air make-up unit is not a steam generating unit; and
  - (3) the one (1) natural gas fired flame treater has a maximum heat input rating of less than 10 MMBtu/hr.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP)**

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this permit for the natural gas-fired drying ovens, air make-up unit and flame treater, because this source is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the natural gas-fired drying ovens, air make-up unit and flame treater, because each unit is not a steam generating (boiler) unit and each commenced construction before June 4, 2010.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

### **Compliance Assurance Monitoring (CAM)**

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

### State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.5 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

#### Drying ovens, flame treater and Air Make-up unit

- (h) 326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
Pursuant to 326 IAC 6-2-2, the particulate matter (PM) from the two (2) drying ovens, flame treater and air make-up units which were all constructed after September 21, 1983, are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are direct fired heaters and not indirect fired heaters.

- (i) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The two (2) drying ovens, flame treater and air make-up units are combustion units for direct heating. Therefore, pursuant to 326 IAC 6-3-1(b)(1), the units are exempt from the requirements of 326 IAC 6-3-2.

### 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 May 31, 2011.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. R059-30592-00023. The staff recommends to the Commissioner that this Registration be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (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: Emissions Calculations  
 Summary Emissions

Company Name: MPI Release Technologies, LLC  
 Address City IN Zip: 2162 Hastings Blvd., Greenfield, IN 46140  
 Permit Number: R059-30592-00023  
 Plt ID: 059-00023  
 Reviewer: C. Sullivan  
 Date: 9/14/2011

**Uncontrolled Emissions**

Emission Units	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	PM <sub>2.5</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	GHGs (tons/yr)	HAPs (tons/yr)	Worst Case HAPs (tons/yr)
Natural Gas Combustion (Dryer Oven 1 & 2, Flame treater, Air Make-up)	0.23	0.93	0.93	0.07	0.67	10.30	12.26	14,806	0.23	0.22 (Hexane)
Paved Roads	0.11	0.02	0.02	--	--	--	--	--	--	--
<b>Total</b>	<b>0.34</b>	<b>0.95</b>	<b>0.95</b>	<b>0.07</b>	<b>0.67</b>	<b>10.30</b>	<b>12.26</b>	<b>14,806</b>	<b>0.23</b>	<b>0.22</b> (Hexane)

Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100

Company Name: MPI Release Technologies, LLC  
 Address City IN Zip: 2162 Hastings Blvd., Greenfield, IN 46140  
 Permit Number: R059-30592-00023  
 Plt ID: 059-00023  
 Reviewer: C. Sullivan  
 Date: 9/14/2011

	MMBtu/hr
NG Dryer Oven 1	7.9
NG Dryer Oven 2	12.9
Flame treater	1.7
Air make-up	5.5
<b>Total</b>	<b>28</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
28.0	1000	245.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.23	0.93	0.93	0.07	12.26	0.67	10.30

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 HAPs Emissions

Company Name: MPI Release Technologies, LLC  
 Address City IN Zip: 2162 Hastings Blvd., Greenfield, IN 46140  
 Permit Number: R059-30592-00023  
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HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.575E-04	1.472E-04	9.198E-03	2.208E-01	4.170E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.132E-05	1.349E-04	1.717E-04	4.660E-05	2.575E-04

Methodology is the same as page 2.

Total                      2.314E-01

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.  
 See Page 4 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Greenhouse Gas Emissions

Company Name: MPI Release Technologies, LLC  
 Address City IN Zip: 2162 Hastings Blvd., Greenfield, IN 46140  
 Permit Number: R059-30592-00023  
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 Reviewer: C. Sullivan  
 Date: 9/14/2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	14,717	0.3	0.3
Summed Potential Emissions in tons/yr	14,717		
CO2e Total in tons/yr	14,806		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 $Emission (tons/yr) = Throughput (MMCF/yr) \times Emission Factor (lb/MMCF) / 2,000 lb/ton$   
 $CO2e (tons/yr) = CO2 Potential Emission ton/yr \times CO2 GWP (1) + CH4 Potential Emission ton/yr \times CH4 GWP (21) + N2O Potential Emission ton/yr \times N2O GWP (310).$

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Date: 9/14/2011

**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 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	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)	1.0	24.0	24.0	8.0	192.0	400	0.076	1.8	663.6
Vehicle (leaving plant) (one-way trip)	1.0	24.0	24.0	8.0	192.0	400	0.076	1.8	663.6
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
<b>Total</b>			<b>48.0</b>		<b>384.0</b>			<b>3.6</b>	<b>1327.3</b>

Average Vehicle Weight Per Trip = 8.0 tons/trip  
Average Miles Per Trip = 0.08 miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	
where k =	0.082	0.016	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	8.0	8.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$

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	
Unmitigated Emission Factor, $E_f =$	0.16	0.03	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.15	0.03	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.05	0.01	0.05	0.01	0.02	0.00
Vehicle (leaving plant) (one-way trip)	0.05	0.01	0.05	0.01	0.02	0.00
	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>0.11</b>	<b>0.02</b>	<b>0.10</b>	<b>0.02</b>	<b>0.05</b>	<b>0.01</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)  
PTE = Potential to Emit



# 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:** Gerald Kerber  
MPI Release Technologies  
2162 Hastings Blvd  
Greenfield, IN 46140

**DATE:** November 1, 2011

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

**SUBJECT:** Final Decision  
Registration - Transition from Title V  
059 - 30592 - 00023

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	LPOGOST 11/1/2011 MPI ReleaseTechnologies, LLC 059 - 30592 - 00023 /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		

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											Remarks
1		Gerald Kerber MPI ReleaseTechnologies, LLC 2162 Hastings Blvd Greenfield IN 46140 (Source CAATS) Via confirmed delivery									
2		Hancock County Commissioners 111 American Legion #219 Greenfield IN 46140 (Local Official)									
3		Hancock County Health Department 111 America Legion Greenfield IN 46140-2365 (Health Department)									
4		Greenfield City Council and Mayors Office 10 S. State St. Greenfield IN 46140 (Local Official)									
5		Timothy Scroggins 3171 W 1000 N Fortville IN 46040 (Affected Party)									
6		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
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