



# 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: December 29, 2011

RE: Dolco Packaging / 001-30927-00032

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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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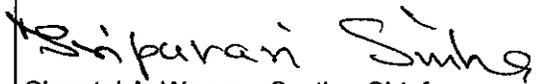
## Part 70 Operating Permit OFFICE OF AIR QUALITY

**Dolco Packaging  
2110 Patterson Street  
Decatur, Indiana 46733**

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T001-30927-00032	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 29, 2011 Expiration Date: December 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 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary polystyrene extrusion plant.

Source Address:	2110 Patterson Street, Decatur, Indiana 46733
General Source Phone Number:	(260) 728-2161
SIC Code:	3086
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) polystyrene food packaging production line consisting of the following:
- (1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour.
  - (2) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions controlled by a thermal oxidizer (constructed in 1998), with maximum capacities included in a confidential file.
  - (3) Underpress grinders located under the thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
  - (4) One (1) underpress grinder and thermoformer for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, approved for construction in 2008, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
  - (5) One (1) polystyrene foam extruder, identified as E-5, approved in 2011 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions controlled by a thermal oxidizer (constructed in 1998).
- (b) Eight (8) offset printers, constructed in 1972, and one (1) offset printer, approved for construction in 2008, with a combined estimated maximum ink usage of 38,000 pounds per year of ultraviolet light-activated and oil based inks.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (d) Gasoline generators not exceeding 110 horsepower.
- (e) Stationary fire pumps.
- (f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO<sub>2</sub>, NO<sub>x</sub>, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and five-tenths (2.5) tons per year:
  - (1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons.
  - (2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.
  - (3) Five (5) extruder feed containers for talc.
  - (4) Five (5) extruder feed containers for colorator.
  - (5) Eight (8) day tanks for material handling and transfer.
  - (6) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions.
  - (7) Cured rollstock operations associated with processing of polystyrene foam shipped from outside.
  - (8) Repelletizer installed in 1994, with a capacity of 500 lbs/hr.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

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)]**

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]**

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]**

- (a) This permit, T001-30927-00032, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

**B.6 Enforceability [326 IAC 2-7-7] [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 2-7-5(5)]**

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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 2-7-5(6)(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 2-7-5(6)(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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
  - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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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 July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.13 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4(c)(9) 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 2-7 and any other applicable rules.
  - (g) 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.

**B.14 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided

that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T001-30927-00032 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

**B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

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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 Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]**

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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 2-7-4. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs  
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of

economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.22 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.23 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within 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) Except as provided in 326 IAC 2-7-19(e), 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.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

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

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

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

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

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

**C.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]**

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]**

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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

**C.7 Stack Height [326 IAC 1-7]**

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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.10 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 2-7-5(1)][326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

#### **C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be maintained 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). 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.20 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) polystyrene food packaging production line consisting of the following:
- (1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour.
  - (2) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions controlled by a thermal oxidizer (constructed in 1998), with maximum capacities included in a confidential file.
  - (3) Underpress grinders located under the thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
  - (4) One (1) underpress grinder and thermoformer for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, approved for construction in 2008, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
  - (5) One (1) polystyrene foam extruder, identified as E-5, approved in 2011 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions controlled by a thermal oxidizer (constructed in 1998).

(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 2-7-5(1)]

#### D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable to this polystyrene foam extrusion process, the following shall apply:

- (a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed 754.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission factors shall not exceed the following:
  - Curing - 13.15 lb VOC/100 lb butane used
  - Storage - 4.86 lb VOC/100 lb butane used
  - Regrind storage silos - 1.41 lb VOC/100 lb butane used
  - Extruders - 4.5 lb VOC/100 lb butane
  - Thermoforming building area - 1.53 lb VOC/100 lb butane
  - Thermoforming waste grinders - 15.63 lb VOC/100 lb butane
  - Extruder waste grinders - 3.15 lb VOC/100 lb butane used
  - Finished product storage - 10.02 lb VOC/100 lb butane used

- (c) The Permittee shall operate the thermal oxidizer, with a minimum destruction efficiency of 97% and capture efficiency of 100% for curing room emissions, 100% for the thermoforming waste grinders, 100% for extruder waste grinders, and 100% for the storage silos at all times that any of the associated processes are in operation.

Compliance with these limitations shall ensure that the emissions of VOC from the extrusion process, in conjunction with VOC emissions from insignificant activities at this source stay below 250 tons per year, rendering 326 IAC 2-2 not applicable.

#### D.1.2 VOC Emissions [326 IAC 8-1-6]

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In order to render 326 IAC 8-1-6 not applicable, the following shall apply:

- (a) The input of butane as a VOC blowing agent to the extruder identified as E-5 shall not exceed 151.0 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission factor for the extruder identified as E-5 shall not exceed 4.5 lb VOC/100 lb butane.

Compliance with this limit shall ensure that the VOC emissions from this extruder (E-5) remains below twenty-five (25) tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 8-1-6 not applicable.

#### D.1.3 Particulate [326 IAC 6-3-2]

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Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations, shall be limited to a total of 8.56 pounds per hour when operating at a total process weight rate of 3.0 tons per hour. This limit was calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all 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.1.5 Particulate Control

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- (a) In order to comply with condition D.1.3, the nine (9) baghouses and RTO pre-filter for particulate control shall be in operation and control emissions from the polystyrene food packaging production line at all times that the polystyrene food packaging production line is 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 notification 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.

#### D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1(b) and D.1.2, not later than 180 days of the issuance of this permit or initial startup of the extruder identified as E-5, whichever is later, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be conducted on the thermal oxidizer while all units associated with the one (1) polystyrene food packaging production line are in operation to determine or verify the following capture efficiencies: 100% for curing room emissions, 100% for the thermoforming waste grinders, 100% for the extruder waste grinders, and 100% for the storage silos. The test shall also verify a minimum destruction efficiency of 97% for the thermal oxidizer. This test shall be repeated at least once every five (5) years from the date of the latest valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

##### D.1.7 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. 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) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with condition D.1.1 as approved by IDEM.
- (c) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (d) The oxidizer shall operate such that if the hourly average temperature falls below the one (1) hour block average minimum required temperature (setpoint) as determined by the latest stack test, reasonable response steps shall be taken to return oxidizer temperature to at least the required minimum temperature setpoint. Reasonable response steps must return the oxidizer temperature to or above the minimum temperature setpoint within one (1) hour of the corrective action, or the polystyrene food packaging production line shall be shut off. 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 or failure to shut off the polystyrene food packaging production line as stated above shall be considered a deviation from this permit.

##### D.1.8 Parametric Monitoring

- (a) The Permittee shall determine the RTO fan Hertz from the most recent valid stack test that demonstrates compliance with Conditions D.1.1 and D.1.2, as approved by IDEM.
- (b) The RTO fan Hertz shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan amperage is outside the normal range of

41 to 43 Hertz or the range as established in the most recent compliant stack test, 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. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit

- (c) The instrument used for determining the butane gas flow input to extruder E-5 shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.9 Visible Emissions Notations

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- (a) Visible emission notations of each of the baghouse stack exhausts shall be performed once per day during normal daylight operations when exhausting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or 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. 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.1.10 Parametric Monitoring

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The Permittee shall record the pressure drop across pre-filter for the thermal oxidizer used in conjunction with the polystyrene food packaging production line, at least three (3) times per day when the process is in operation. When for any one reading, the pressure drop across the pre-filter is outside the normal range of 1.0 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or 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 at least once every six (6) months.

#### D.1.11 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 line. 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 baghouse's 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 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.12 Record Keeping Requirement**

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall:
- (1) Maintain monthly records of the input of butane as a blowing agent to the (5) extruder lines through material purchase records and volumetric measurements of the butane tank.
  - (2) Provide and maintain documentation supporting all of the VOC emission factors for the curing, storage, extrusion, thermoforming, and regrinding operations.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain the continuous temperature records (on an hourly average basis) for the regenerative thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliance stack test.
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the RTO fan Hertz.
- (d) To document the compliance status with Condition D.1.9, the Permittee shall maintain records of once per day visible emission notations of each of the baghouse stack exhausts when exhausting directly to the atmosphere. 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 or did not exhaust directly to the atmosphere).
- (e) To document the compliance status with Condition D.1.10, the Permittee shall maintain once per day records of the pressure drop across the pre-filter for the thermal oxidizer. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (f) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

### **D.1.13 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within not later than thirty (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 the a certification that meets the requirements of 326 IAC 2-7-6(1) by the a "responsible official," as defined by 326 IAC 2-7-1 (34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Dolco Packaging  
Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-30927-00032

**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:

Phone:

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**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Dolco Packaging  
Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-30927-00032

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
  - 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.

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
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**

**Part 70 Quarterly Report**

Source Name: Dolco Packaging  
 Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
 Part 70 Permit No.: T001-30927-00032  
 Facility: Polystyrene food packaging production line  
 Parameter: Source-wide butane blowing agent input  
 Limit: The input of butane as a blowing agent shall be less than 754.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

**Part 70 Quarterly Report**

Source Name: Dolco Packaging  
Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-30927-00032  
Facility: Extruder installed in 2011  
Parameter: Butane blowing agent input  
Limit: The input of butane as a blowing agent shall be less than 151 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Dolco Packaging  
 Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
 Part 70 Permit No.: T001-30927-00032

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

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".	
<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

Dolco Packaging  
2110 Patterson Street  
Decatur, Indiana 46733

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 Dolco Packaging 2110 Patterson Street, Decatur, Indiana 46733, completed construction of the polystyrene foam extruder on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 15, 2011 and as permitted pursuant to New Source Construction Permit and Part 70 Operating Permit No. T001-30927-00032, Plant ID No. 001-00032 issued on \_\_\_\_\_.

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**

Addendum to the  
Technical Support Document for  
a Part 70 Operating Permit

<b>Source Name:</b>	Dolco Packaging
<b>Source Location:</b>	2110 Patterson Street, Decatur, Indiana 46733
<b>County:</b>	Adams
<b>SIC Code:</b>	3086
<b>Permit Renewal No.:</b>	T001-30927-00032
<b>Permit Reviewer:</b>	APT

On November 16, 2011, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrats in Decatur, Indiana stating that Dolco Packaging had applied to transition from a Federally Enforceable Operating Permit (FESOP) to a Part 70 Operating Permit (Title V) for an existing stationary polystyrene extrusion plant. The notice also stated that OAQ proposed to issue a Title V permit for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. If necessary, the Table of Contents will be modified to reflect these changes.

Necessary changes will be noted in this addendum only, as no changes will be made to the TSD.

**Permit T001-30927-00032**

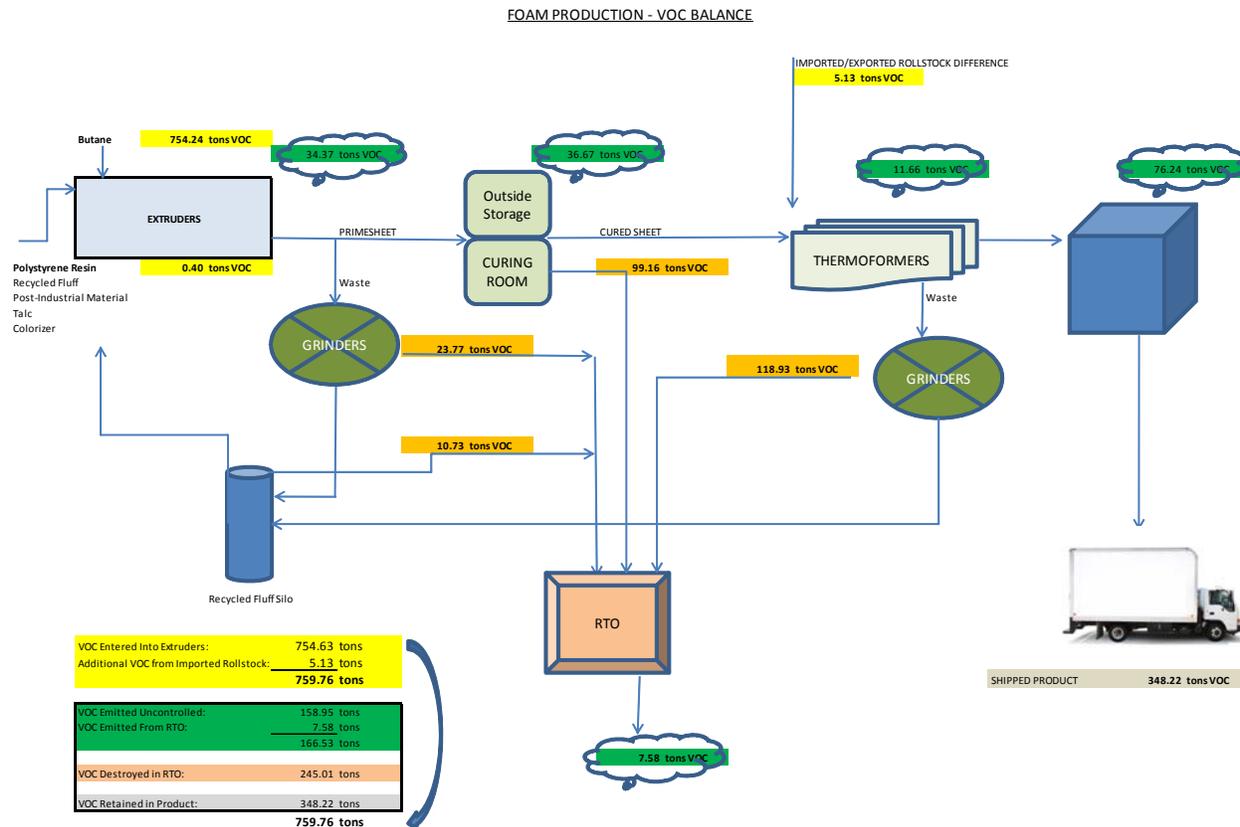
Comments on the proposed Part 70 permit were received on December 22, 2011 from Charmagne Ackerman, representing the U.S. EPA - Region 5. Comments will be addressed in the order that the permit will be affected, and updates to the Table of Contents will not be denoted in this document.

**Comment #1**

Can you walk through the process so I fully understand where the recycled material comes back into the process?

**Response to Comment #1**

All recycled material from the grinders is pneumatically transported into the silos, where it is ultimately reintroduced back into the beginning of the process as regrind charge. Emissions associated with the release of VOC during the grinding and storage operation are accounted for, along with particulate emissions associated with the transport of that material. All potential emission rates are based on the maximum throughput of the equipment. (See Flow Diagram below). No changes have been made to the permit as a result of this comment.



**Comment #2**

Has the confidentiality claim been assessed for the maximum capacities of the equipment? I feel this information is pertinent for public review when considering the unrestricted potential emissions for the facility.

**Response to Comment #2**

During the review process maximum equipment outputs were not considered confidential, despite the facility initially requesting a claim of confidentiality. All maximum capacities were included within the application documents for public review. No changes have been made to the permit as a result of this comment.

**Comment #3**

What is the source for the "emission factors" used in D.1.1.?

**Response to Comment #3**

The original source of that data was obtained from a butane material balance test program conducted at DOLCO Packaging Corporation's facility located in Lawrenceville, Georgia. The study, "Test Protocol for the Determination of Butane Content in Polystyrene Foam Products," was completed for Dolco Packaging Corp by Bell Laboratories, a division of Lucent Technologies, in 1996. A quantitative determination of butane mass was obtained from representative samples of polystyrene rollstock/product at each stage of the manufacturing/storage process. Differences in the mass of butane existing between subsequent operations were attributed to losses into the atmosphere. See examples below. No changes have been made to the permit as a result of this comment.

<b>ESTIMATION OF ANNUAL EMISSIONS</b>							
<b>Emission Unit:</b>		<b>Polystyrene Food Packaging Production Line</b>					
<b>Butane Blowing Agent</b>							
Mass Utilized (tons):		754.24					
		VOC					
	Gas Allocation	Emission	Capture	Destruction	Overall	VOC Mass	VOC Mass
	(%)	Rate	Efficiency	Efficiency	Efficiency	Controlled	Emitted
		(TPY)	(%)	(%)	(%)	(TPY)	(TPY)
<b>Emitted into:</b>							
Extruder Building Area		4.5	33.98	0%	0%	0.00%	33.98
Extruder Waste Grinders		3.2	23.77	100%	97%	97.00%	0.71
Curing Operation		18.0	135.83				
Curing Room			99.16	100%	97%	97.00%	2.97
Outside Storage			36.67	0%	0%	0.00%	36.67
Thermoforming Building Area		1.5	11.56	0%	0%	0.00%	11.56
Thermoforming Waste Grinders		15.6	117.85	100%	97%	97.00%	3.54
Final Product Storage		10.0	75.55	0%	0%	0.00%	75.55
Regrind Storage Silos		1.4	10.65	100%	97%	97.00%	0.32
Retained in Product		45.7					
		100.0	409.18				165.30
<b>Rollstock Storage:</b>		73 % of rollstock contained in Curing Area (100% Capture)					
		27 % of rollstock stored in outside dedicated area (0% Capture)					

VOC Emission Factor (before controls) (lbs VOC emitted/100 lbs VOC Charged)	CHECK	VOC Emission Factor (after controls) (lbs VOC emitted/100 lbs VOC Charged)	CHECK
4.50	33.98	4.50	33.98
3.15	23.77	0.09	0.71
	0.00		
13.15	99.16	0.39	2.97
4.86	36.67	4.86	36.67
1.53	11.56	1.53	11.56
15.63	117.85	0.47	3.54
10.02	75.55	10.02	75.55
1.41	10.65	0.04	0.32
	409.18		165.30

Examples:

Extruder Building Area:

$$\left( \frac{33.98 \text{ lbs VOC emitted}}{754.24 \text{ lbs blowing gas charged}} \right) \times (100) = \frac{4.50 \text{ lbs VOC emitted}}{100 \text{ lbs blowing gas charged}}$$

Thermoforming Waste Grinders (before control)

$$\left( \frac{117.85 \text{ lbs VOC emitted}}{754.24 \text{ lbs blowing gas charged}} \right) \times (100) = \frac{15.63 \text{ lbs VOC emitted}}{100 \text{ lbs blowing gas charged}}$$

Thermoforming Waste Grinders (after control)

$$\left( \frac{3.54 \text{ lbs VOC emitted}}{754.24 \text{ lbs blowing gas charged}} \right) \times (100) = \frac{0.47 \text{ lbs VOC emitted}}{100 \text{ lbs blowing gas charged}}$$

**Comment #4**

How will compliance be determined for limits in D.1.1 from Storage, Regrinding Storage Silo, Extruders, Thermoforming building area, and finished product storage?

**Response to Comment #4**

Compliance for each of those cited emission sources are to be determined by monitoring the mass of blowing gas charged into the extruders and then multiplying that value by the applicable emission factor. See example below. No changes have been made to the permit as a result of this comment.

Example: One hundred (100) tons of butane blowing gas charged into extruders

<b>Butane Blowing Agent</b>							
Mass Utilized (tons):		100.00					
Emitted into:	Gas Allocation (%)	VOC Emission Rate (TPY)	Capture Efficiency (%)	Destruction Efficiency (%)	Overall Efficiency (%)	VOC Mass Controlled (TPY)	VOC Mass Emitted (TPY)
Extruder Building Area	4.5	4.50	0%	0%	0.00%	0.0	4.50
Extruder Waste Grinders	3.2	3.15	100%	97%	97.00%	3.1	0.09
Curing Operation	18.0	18.01					
Curing Room		13.15	100%	97%	97.00%	12.8	0.39
Outside Storage		4.86	0%	0%	0.00%	0.0	4.86
Thermoforming Building Area	1.5	1.53	0%	0%	0.00%	0.0	1.53
Thermoforming Waste Grinders	15.6	15.63	100%	97%	97.00%	15.2	0.47
Final Product Storage	10.0	10.02	0%	0%	0.00%	0.0	10.02
Regrind Storage Silos	1.4	1.41	100%	97%	97.00%	1.4	0.04
Retained in Product	45.7						
	100.0	54.25					21.92

Thus, the following emissions sources are documented:

- Curing Operation-Storage – 4.86 tons VOC
- Regrinding Storage Silo – 0.04 tons VOC
- Extruder Building Area – 4.50 tons VOC
- Thermoforming Building Area – 1.53 tons VOC
- Finished Product Storage – 10.02 tons VOC

**Comment #5**

How will compliance with the limited "emission factor" be determined for D.1.2?

**Response to Comment #5**

Compliance with D.1.2(a) will be determined by employing a meter (attached to the butane gas inlet for the extruder) that will quantitatively monitor and record the mass of blowing gas charged into the extruder

identified as E-5. The mass of blowing gas charged per month will be multiplied by the applicable emission factor to document mass of VOC emitted from that equipment.

Example: ten (10) tons butane gas charged into extruder E-5

$$\left( \frac{4.50 \text{ lbs VOC emitted}}{100 \text{ lbs blowing gas charged}} \right) \times \left( \frac{10 \text{ tons blowing gas charged}}{\text{month}} \right) \times \left( \frac{2,000 \text{ lbs}}{1 \text{ ton}} \right) = \frac{900 \text{ lbs VOC emitted}}{\text{month}}$$

The limit in Condition D.1.2(b) ensures that the source consistently uses the same emission factor throughout the reporting period until such time that a different emission factor is approved for use. Compliance with this emission factor is presumed if all parameters of the gas flow, the thermal oxidizer (capture, destruction efficiency, and temperature), and fan Hertz remain in compliance.

The following changes have been made to the permit as a result of this comment:

**Change No. 1:** To be clear, the emission unit ID and the description of the inlet butane gas meter has been added to the emission unit description in Section A and Section D.1 of the permit as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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

\* \* \*

- (5) One (1) polystyrene foam extruder, **identified as E-5, approved in 2011 for construction, permitted in 2011, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and** with VOC emissions controlled by a thermal oxidizer (constructed in 1998). ~~with maximum capacity included in a confidential file.~~

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) polystyrene food packaging production line consisting of the following:

\* \* \*

- (5) One (1) polystyrene foam extruder, **identified as E-5, approved in 2011 for construction, permitted in 2011, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and** with VOC emissions controlled by a thermal oxidizer (constructed in 1998). ~~with maximum capacity included in a confidential file.~~

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

**Change No. 2:** To be clear, the emission unit ID has been added to the limit for 326 IAC 8-1-6 (BACT) as follows:

D.1.2 VOC Emissions [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 not applicable, the following shall apply:

- (a) The input of butane as a VOC blowing agent to the extruder **identified as E-5** ~~installed in 2014~~ shall not exceed 151.0 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission factor for the extruder **identified as E-5** shall not exceed 4.5 lb VOC/100 lb butane.

Compliance with this limit shall ensure that the VOC emissions from this extruder (**E-5**) remains below **twenty-five (25)** tons per twelve (12) consecutive month period, rendering **the requirements of 326 IAC 8-1-6** not applicable.

**Change No. 3:** The following changes have been made to the compliance Determination and Monitoring sections, and the Record Keeping and Reporting section of the permit to include the emission unit ID, instrument specifications, increased monitoring frequency, and clear record keeping requirements:

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1(b) and D.1.2, ~~within not later than 180~~ days of the issuance of this permit or initial startup of **the extruder identified as E-5** ~~Extruder #5~~, whichever is later, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be conducted on the thermal oxidizer **while all units associated with the one (1) polystyrene food packaging production line are in operation** to determine or verify the following capture efficiencies: 100% for curing room emissions, 100% for the thermoforming waste grinders, 100% for the extruder waste grinders, and 100% for the storage silos. The test shall also verify a minimum destruction efficiency of 97% for the thermal oxidizer. This test shall be repeated at least once every five (5) years from the date of the latest valid compliance demonstration. ~~Testing shall be conducted in accordance with Section C - Performance Testing.~~ **Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

D.1.8 Parametric Monitoring

\* \* \*

- (c) **The instrument used for determining the butane gas flow input to extruder E-5 shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.**

D.1.10 Parametric Monitoring

The Permittee shall record the pressure drop across pre-filter for the thermal oxidizer used in conjunction with the polystyrene food packaging production line, at least ~~one~~ **three (3) times** per day when the process is in operation.

\* \* \*

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.12 Record Keeping Requirement

- (a) To document **the compliance status** with Conditions D.1.1(a) and D.1.2, the Permittee shall:

\* \* \*

- (2) **Provide and maintain** ~~D~~documentation supporting the VOC emission factors for the curing, storage, extrusion, thermoforming, and regrinding operations.

**Comment #6**

Do the testing requirements in D.1.6 only apply to extruder E-5?

#### **Response to Comment #6**

The emission test program is being conducted to verify the capture and control efficiency for the entire Polystyrene Food Packaging Production Line that requires the following:

- 100% for curing room emissions,
- 100% for the thermoforming waste grinders,
- 100% for the extruder waste grinders, and
- 100% for the storage silos.
- Destruction efficiency of 97% for the thermal oxidizer

The testing language specifies that the testing should be conducted "**not later than 180 days of the issuance of this permit or initial startup of the extruder identified as E-5, whichever is later...**" so that the testing will encompass the changes (if any) in capture and destruction efficiency of the thermal oxidizer after the addition of the new unit (E-5). No changes have been made to the permit as a result of this comment.

#### **Comment #7**

Condition D.1.7 includes compliance monitoring requirements for the thermal oxidizer temperature. The conditions do not include how often readings are taken, it mentions that they will be recorded as an hourly average, but does not specify how many data points are averaged (readings every 15 minutes and recorded as 1 hour average)?

#### **Response to Comment #7**

Continuous monitoring is completed with a chart recorder utilizing ninety (90) data points an hour. Readings are completed every forty (40) seconds. The standard continuous monitoring for this industry type means no less often than once per fifteen (15) minutes. Therefore, the following changes have been made to Condition D.1.7, Thermal Oxidizer Temperature:

#### **Change No. 4:**

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

##### **D.1.7 Thermal Oxidizer Temperature**

- 
- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. **For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes.** The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. ~~Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~ **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) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with condition D.1.1 ~~(a) and (b)~~ as approved by IDEM.
- (c) **If the primary continuous monitoring system is not in operation, the oxidizer**

**temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.**

- (d) **The oxidizer shall operate such that if the hourly average temperature falls below the one (1) hour block average minimum required temperature (setpoint) as determined by the latest stack test, reasonable response steps shall be taken to return oxidizer temperature to at least the required minimum temperature setpoint. Reasonable response steps must return the oxidizer temperature to or above the minimum temperature setpoint within one (1) hour of the corrective action, or the polystyrene food packaging production line shall be shut off. 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 or failure to shut off the polystyrene food packaging production line as stated above shall be considered a deviation from this permit.**
- ~~(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

#### **Comment #8**

Condition D.1.8 is parametric monitoring using fan amperage. The condition does not specify which fans will be monitored.

#### **Response to Comment #8**

Conditions D.1.8 and D.1.12(c) should list the fan as RTO Fan and the observation should be made for the fan Hertz not amps. The following changes have been made to Condition D.1.8:

#### **Change No. 5:**

##### D.1.8 Parametric Monitoring

- 
- (a) The Permittee shall determine the ~~fan amperage~~ **RTO fan Hertz** from the most recent valid stack test that demonstrates compliance with Conditions D.1.1 and D.1.2, as approved by IDEM.
- (b) The ~~fan amperage~~ **RTO fan Hertz** shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan amperage is outside the normal range of 41 to 43 ~~amp~~ **Hertz** or the range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances,~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. **Failure to take response steps shall be considered a deviation from this permit**

\* \* \*

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.12 Record Keeping Requirement**

---

\* \* \*

- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the **RTO fan Hertz fan amperage**.

\* \* \*

**Comment #9**

It is not clear for which requirement the monitoring, Condition D.1.10, is being used to determine ongoing compliance.

**Response to Comment #9**

The monitoring Condition D.1.10 is a requirement of the RTO operational parameters used in stack testing to ensure RTO destruction efficiencies and to ensure compliance with Condition D.1.5 for particulate control. No changes have been made to the permit as a result of this comment.

**Comment #10**

Can you clarify that D.1.12(a)(2) includes all "emission factors" listed in D.1.1

**Response to Comment #10**

Yes, all VOC emission factors and supporting documentation is to be maintained by the facility. The following changes have been made to Condition D.1.12 for clarification purposes:

**Change No. 6:**

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.12 Record Keeping Requirement**

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- (a) To document compliance with Conditions D.1.1(a) and D.1.2, the Permittee shall:

\* \* \*

- (2) Provide and maintain documentation supporting **all of** the VOC emission factors for the curing, storage, extrusion, thermoforming, and regrinding operations.

\* \* \*

**Comment #11**

It is not clear from the permit which process units are controlled by the 9 baghouses. Also, there are not testing, monitoring or recordkeeping requirements for these baghouses.

**Response to Comment #11**

The baghouses control exhaust from the regrind material. The baghouse exhausts are vented into the RTO and across the prefilter. The facility will ensure that the baghouses are operating efficiently as noted in Conditions D.1.9 (Visible Emission Notations), D.1.10 (Parametric Monitoring), and D.1.11 (Broken or Failed Bag Detection). The following changes have been made to the permit as a result of this comment:

**Change No. 7:**

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]**

---

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

- (a) One (1) polystyrene food packaging production line consisting of the following:

\* \* \*

- (3) Underpress grinders located under the thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, **with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.**
- (4) One (1) underpress grinder and thermoformer for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, approved for construction in 2008, with VOC **and particulate** emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.

\* \* \*

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) polystyrene food packaging production line consisting of the following:

\* \* \*

- (3) Underpress grinders located under the thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, **with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.**
- (4) One (1) underpress grinder and thermoformer for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, approved for construction in 2008, with VOC **and particulate** emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.

\* \* \*

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

### Additional Changes

IDEM has modified the language for several standard Title V permitting B and C Conditions. Many of these standard language changes have affected Conditions in the D Sections of the permit. The following necessary administrative changes to the Part 70 Operating Permit have been made as follows:

Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

**Change No. 8:** For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section C ... contains the Permittee's obligations with regard to the records required by this condition."

**Change No. 9:** The phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than" except for the timelines for Title V Fee, Emergency Provisions,

Continuous Compliance Plan, and Revocation of Permits (Conditions newly numbered as B.11, B.15, B.23, and C.10) because the underlying rules state "within."

**Change No. 10:** 326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM is revising all instances of "the responsible official" to read "a responsible official."

**Change No. 11:** The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

#### D.1.9 Visible Emissions Notations

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\* \* \*

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. ~~steps in accordance with 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.** ~~in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

#### D.1.10 Parametric Monitoring

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The Permittee shall record the pressure drop across pre-filter for the thermal oxidizer used in conjunction with the polystyrene food packaging production line, at least once per day when the process is in operation. When for any one reading, the pressure drop across the pre-filter is outside the normal range of 1.0 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. **Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** ~~in accordance with Section C - Response to Excursions or Exceedances.~~ 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.** ~~in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

\* \* \*

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.12 Record Keeping Requirement

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- (a) To document **the compliance status** with Conditions D.1.1(~~a~~) and D.1.2, the Permittee shall:
- (1) Maintain monthly records of the input of butane as a blowing agent to the (5) extruder lines through material purchase records and volumetric measurements of the butane tank.
  - (2) Provide and maintain documentation supporting all of the VOC emission factors for the curing, storage, extrusion, thermoforming, and regrinding operations.
- (b) To document **the compliance status** with Condition D.1.7, the Permittee shall maintain the continuous temperature records (on an hourly average basis) for the regenerative thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliance stack test.

- (c) To document **the compliance status** with Condition D.1.8, the Permittee shall maintain daily records of the fan amperage.
- (d) To document **the compliance status** with Condition D.1.9, the Permittee shall maintain records of once per day visible emission notations of each of the baghouse stack exhausts when exhausting directly to the atmosphere. 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 or did not exhaust directly to the atmosphere).
- (e) To document **the compliance status** with Condition D.1.10, the Permittee shall maintain once per day records of the pressure drop across the pre-filter for the thermal oxidizer. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (f) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **contains the Permittee's obligations with regard to the records required by this condition.**

#### D.1.13 Reporting Requirements

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A quarterly summary of the information to document **the compliance status** with Conditions D.1.1(a) and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within **not later than** thirty (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 the a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official," as defined by 326 IAC 2-7-1 (34).

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

Technical Support Document (TSD) for a Transition  
from a Federally Enforceable State Operating Permit  
to a Part 70 Permit

**Source Description and Location**

Source Name:	Dolco Packaging
Source Location:	2110 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3086
Operating Permit No.:	T001-30927-00032
Permit Reviewer:	Madhurima Moulik

**Existing Approvals**

The source was issued FESOP Second Renewal No. F001-24032-00032 issue on May 29, 2008. The source has since received the following approvals:

- (a) First Administrative Amendment No. 001-26617-00032 issued on June 10, 2008; and
- (b) Second Administrative Amendment No. 001-27201-00032 issued on December 31, 2008.

**County Attainment Status**

The source is located in Adams County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (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. Adams 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>**  
Adams 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  
 Adams County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	2,108
PM-10	2,108
PM2.5	2,108
SO <sub>2</sub>	Negligible
VOC	417.35
CO	3.0
CO <sub>2</sub> e	4,373
NO <sub>x</sub>	3.60

HAPs	tons/year
Single HAP	<10
Combined HAP	<25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub> and VOC are equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7.

**Source Status**

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

Pollutant	Emissions (ton/yr)
PM	21.18
PM <sub>10</sub>	21.18
PM <sub>2.5</sub>	21.18
SO <sub>2</sub>	Negligible
VOC	173.82
CO	3.00
CO <sub>2</sub> e	4,373
NO <sub>x</sub>	3.60
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no regulated pollutant, excluding GHG, is emitted at a rate of two hundred fifty (250) tons per year or more, emissions of GHG are less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are 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, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based upon emissions calculations submitted by the Permittee (see Appendix A to the Technical Support Document).

**Background and Description of Emission Units**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Dolco Packaging on September 15, 2011, relating to the operation of a polystyrene extrusion plant. Dolco Packaging is transitioning from a Federal Enforceable Operating Permit (FESOP) to a Part 70 Operating Permit due to an anticipated increase in production, leading to an increase in VOC emissions that are expected to exceed FESOP limits. In addition, the Permittee requests the addition of the following emission unit:

- (a) One (1) polystyrene foam extruder, permitted in 2011, with maximum capacity included in a confidential file.

The source has the following emissions units and insignificant activities previously permitted under FESOP F001-24032-00032 (as listed in the FESOP): (Note: Some insignificant activities previously not included in the permit have been added)

- (a) One (1) polystyrene food packaging production line consisting of the following:
  - (1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour.
  - (2) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions controlled by a thermal oxidizer (constructed in 1998), with maximum capacities included in a confidential file.
  - (3) Underpress grinders located under the thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse.

- (4) One (1) underpress grinder and thermoformer for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, approved for construction in 2008, with VOC emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
- (5) One (1) polystyrene foam extruder, permitted in 2011, with VOC emissions controlled by a thermal oxidizer (constructed in 1998), with maximum capacity included in a confidential file.
- (b) Eight (8) offset printers, constructed in 1972, and one (1) offset printer, approved for construction in 2008, with a combined estimated maximum ink usage of 38,000 pounds per year of ultraviolet light-activated and oil based inks.

Insignificant Activities:

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (d) Gasoline generators not exceeding 110 horsepower.
- (e) Stationary fire pumps.
- (f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO<sub>2</sub>, NO<sub>x</sub>, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and five-tenths (2.5) tons per year:
  - (1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons.
  - (2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.
  - (3) Five (5) extruder feed containers for talc.
  - (4) Five (5) extruder feed containers for colorator.
  - (5) Eight (8) day tanks for material handling and transfer.
  - (6) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions.
  - (7) Cured rollstock operations associated with processing of polystyrene foam shipped from outside.
  - (8) Repelletizer installed in 1994, with a capacity of 500 lbs/hr.

<b>Enforcement Issues</b>
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There are no pending enforcement actions.

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

**Federal Rule Applicability Determination**

**NSPS:**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this Part 70 permit.
- (b) The insignificant storage tanks at this source are not subject to the NSPS, 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) because each storage tank has a capacity of less than 75 cubic meters.

**NESHAP:**

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 20 and 40 CFR Part 63) included in this Part 70 permit.

**CAM:**

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

<b>CAM Applicability Analysis</b>							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Curing Room/VOC	Y	Y	<100	<100	100	N	N
Polystyrene Extruders (each)/VOC	Y	Y	<100	<100	100	N	N
Grinders and Thermoformer/VOC	Y	Y	<100	<100	100	N	N
Grinder and Thermoformer/PM	Y	Y	<100	<100	100	N	N
Nine (9) silos (each)/VOC	Y	Y	<100	<100	100	N	N
Nine (9) silos (each)/PM	Y	Y	<100	<100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the emissions units as part of this operating permit.

### State Rule Applicability Determination

#### **326 IAC 2-1.1-5 (Nonattainment New Source Review)**

Nonattainment New Source Review applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

In order to render 326 IAC 2-2 not applicable to this polystyrene foam extrusion process, the following shall apply:

- (a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed 754.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission factors shall not exceed the following:
  - Curing - 13.15 lb VOC/100 lb butane used
  - Storage - 4.86 lb VOC/100 lb butane used
  - Regrind storage silos - 1.41 lb VOC/100 lb butane used
  - Extruders - 4.5 lb VOC/100 lb butane
  - Thermoforming building area - 1.53 lb VOC/100 lb butane
  - Thermoforming waste grinders - 15.63 lb VOC/100 lb butane
  - Extruder waste grinders - 3.15 lb VOC/100 lb butane used
  - Finished product storage - 10.02 lb VOC/100 lb butane used
- (c) The Permittee shall operate the thermal oxidizer, with a minimum destruction efficiency of 97% and capture efficiency of 100%, at all times that any of the associated processes are in operation.

The limitation on the butane usage is based on the maximum operational capacity of the five (5) extruders. The controlled source-wide VOC emissions for 754.2 tons of butane usage are about 174 tons, based on the thermal oxidizer control efficiencies stated above. Additional use of butane is theoretically possible, leading to unused butane emissions. Therefore, a conservative butane usage limitation has been included as shown above, as requested by the Permittee.

Compliance with these limitations shall ensure that the emissions of VOC from the extrusion process in conjunction with VOC emissions from insignificant activities at this source stay below 250 tons per year, rendering 326 IAC 2-2 not applicable.

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

The operation of this facility will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### **326 IAC 2-6 (Emission Reporting)**

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2012, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the polystyrene food packaging production line, including the nine (9) silos and

the final product storage operations, shall be limited to a total of 8.56 pounds per hour when operating at a total process weight rate of 3.0 tons per hour. This limit was calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

The nine (9) baghouses and RTO pre-filter shall be in operation at all times the polystyrene food packaging production line is in operation, in order to comply with this limit.

### **326 IAC 8-1-6 (Volatile Organic Compounds)**

The new extruder has maximum uncontrolled VOC emissions of 6.8 tons per year, with maximum operational annual butane usage of 150.9 tons. Usable product cannot be manufactured if excess butane is used. However, it is possible for excess butane to be pumped into the extrusion process, leading to additional emissions of butane. Therefore, a butane usage limitation of 151 tons per twelve (12) consecutive month period has been included in the permit.

In order to render 326 IAC 8-1-6 not applicable, the following shall apply:

- (a) The input of butane as a VOC blowing agent to the extruder installed in 2011 shall not exceed 151.0 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission factor for the extruder shall not exceed 4.5 lb VOC/100 lb butane.

Compliance with this limit shall ensure that the potential VOC emissions from the extruder installed in 2011 are limited to less than 25 tons per year, making 326 IAC 8-1-6 not applicable.

## **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this modification are as follows:

- (a) In order to comply with conditions D.1.3, the nine (9) baghouses and RTO pre-filter for particulate control shall be in operation and control emissions from the polystyrene food packaging production line at all times that the polystyrene food packaging production line is 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 notification 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.
- (c) **Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]**  
In order to demonstrate compliance with Conditions D.1.1(b) and D.1.2, within 180 days of the issuance of this permit or initial startup of Extruder #5, whichever is later, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be conducted on the thermal oxidizer to determine or verify the following capture efficiencies: 100% for curing room emissions, 100% for the thermoforming waste grinders, extruder waste grinders, and 100% for the storage silos. The test shall also verify a minimum destruction efficiency of 97% for the thermal oxidizer. This test shall be repeated at least once every five (5) years from the date of the latest valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

The compliance monitoring requirements applicable to this modification are as follows:

**1. Thermal Oxidizer Temperature**

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with condition D.1.1(a) and (b) as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

**2. Parametric Monitoring**

- (a) The Permittee shall determine the fan amperage from the most recent valid stack test that demonstrates compliance with Condition D.1.1(b), as approved by IDEM.
- (b) The fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan amperage is outside the normal range of 41 to 43 hertz or the range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

**3. Visible Emissions Notations**

- (a) Visible emission notations of each of the baghouse stack exhausts shall be performed once per day during normal daylight operations when exhausting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or 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 in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

**4. Parametric Monitoring**

The Permittee shall record the pressure drop across pre-filter for the thermal oxidizer used in conjunction with the polystyrene food packaging production line, at least once per day when the process is in operation. When for any one reading, the pressure drop across the pre-filter is outside the normal range of 1.0 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances 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 at least once every six (6) months.

**5. Broken or Failed Bag Detection**

- (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 line. 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 baghouse's 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.

### Conclusion and Recommendation

The construction and operation at this facility shall be subject to the conditions of the attached proposed NSR/Part 70 permit no. T001-30927-00032. The staff recommends to the Commissioner that this NSR/Part 70 permit be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik 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) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**TSD Appendix A: Emission Calculations  
Summary - Emissions Calculations**

**Company Name:** Dolco Packaging  
**Address City IN Zip:** 2110 Patterson Street, Decatur, IN 46733  
**Permit Number:** T001-30927-00032  
**Plt ID:** 001-00032  
**Reviewer:** Madhurima D. Moulik  
**Date:** 10/12/11

**Unrestricted Potential Emissions (tons/year)**

Emissions Generating Activity				
Pollutant	Polystyrene Manufacturing Process	Thermal Oxidizer and Heater Natural Gas Combustion	Printing	TOTAL
PM	2,108.00	0.10	0.00	2,108.10
PM10	2,108.00	0.30	0.00	2,108.30
Direct PM2.5	2,108.00	0.30	0.00	2,108.30
SO2	0.00	0.00	0.00	0.00
NOx	0.00	3.60	0.00	3.60
VOC	409.18	0.20	7.97	417.35
CO	0.00	3.00	0.00	3.00
total HAPs	0.40	0.00	0.00	0.40
worst case single HAP	0.37	0.00	0.00	0.37
CO2e	0.00	4,373.00	0.00	4,373.0

Total emissions based on rated capacity at 8,760 hours/year.

**Controlled Potential Emissions (tons/year)**

Emissions Generating Activity				
Pollutant	Polystyrene Manufacturing Process	Thermal Oxidizer Combustion	Printing	TOTAL
PM	21.08	0.10	0.00	21.18
PM10	21.08	0.30	0.00	21.38
SO2	21.08	0.00	0.00	21.08
NOx	0.00	3.60	0.00	3.60
VOC	165.65	0.20	7.97	173.82
CO	0.00	3.00	0.00	3.00
CO2e	0.00	4,373.00	0.00	4,373.0
total HAPs	0.40	0.00	0.00	0.40
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacity at 8,760 hours/year, after control.

For VOC/HAP emissions, see detailed calculations in Polystyrene - resin table.



## Appendix A: Emission Calculations

**Company Name:** Dolco Packaging  
**Address City IN Zip:** 2110 Patterson Street, Decatur, IN 46733  
**Permit Number:** T001-30927-00032  
**Plt ID:** 001-00032  
**Reviewer:** Madhurima D. Moulik  
**Date:** 10/12/11

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### Printing Operations

#### Eight (8) Offset Printers

Note: It is assumed that all VOC from the ink is emitted as a worst case scenario.

Oil based Ink	8000	VOC content	UV Curable based (lb)	30000	VOC Content = 0.1%
Cleaning solvent emitted (gal)=		2400	VOC content = 100%		density = 6.54 lb/gal
Oil based Ink VOC emissions (tons/yr) =		<b>0.10</b>			
UV Curable based (tons/yr) =		<b>0.02</b>			
Cleaning solvent (tons/yr) =		<b>7.85</b>			
Total =			<b>7.97 tons/yr</b>		

Methodology: Emissions = usage rate, lb/hr \* % VOC by wt \* 8760 hr/yr \* ton/2000 lb

**Appendix A: Emission Calculations**  
**Natural Gas Combustion (RTO and Heaters)**  
**Company Name: Dolco Packaging**  
**Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733**  
**Permit Number: T001-30927-00032**  
**Plt ID: 001-00032**  
**Reviewer: Madhurima D. Moulik**  
**Date: 10/12/11**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
8.3	1000	72.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.1	0.3	0.3	0.0	3.6	0.2	3.0

\*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

**Appendix A: Emission Calculations**  
**NG Combustion (RTO and Heaters)**  
**Company Name: Dolco Packaging**  
**Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733**  
**Permit Number: T001-30927-00032**  
**Plt ID: 001-00032**  
**Reviewer: Madhurima D. Moulik**  
**Date: 10/12/11**

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	7.607E-05	4.347E-05	2.717E-03	6.520E-02	1.232E-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	1.811E-05	3.984E-05	5.071E-05	1.376E-05	7.607E-05

Methodology is the same as page 1.

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 3 for Greenhouse Gas calculations.

**Appendix A: Emission Calculations**  
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	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	4,347	0.1	0.1
Summed Potential Emissions in tons/yr	4,347		
CO2e Total in tons/yr	4,373		

**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) x Emission Factor (lb/MMCF)/2,000 lb/ton  
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).



# 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: Ken Robertson  
Dolco Packaging  
2110 Patterson Street  
Decatur, IN 46733

DATE: December 29, 2011

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

SUBJECT: Final Decision  
Part 70 Operating Permit  
001-30927-00032

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:  
Jim Carosella – Director of Manufacturing  
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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December 29, 2011

TO: Decatur Public Library

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

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

**Applicant Name: Dolco Packaging**  
**Permit Number: 001-30927-00032**

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 12/29/2011 Dolco Packaging 001-30927-00032 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		Ken Robertson Dolco Packaging 2110 Patterson St Decatur IN 46733 (Source CAATS) via confirmed delivery										
2		Jim Carosella Director of Mfg Dolco Packaging 1150 First Ave, Ste 500 King of Prussia PA 19406 (RO CAATS)										
3		Adams County Commissioners 313 West Jefferson Street Decatur IN 46733 (Local Official)										
4		Adams County Health Department County Svcs Complex, 313 W. Jefferson # 314 Decatur IN 46733-1673 (Health Department)										
5		Decatur Public Library 128 S 3rd St Decatur IN 46733-1691 (Library)										
6		Mr. Phil Estridge 6651 S Greensboro Pike Knightstown IN 46148 (Affected Party)										
7		Decatur City Council and Mayors Office 225 W. Monroe St. Decatur IN 46733 (Local Official)										
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
9												
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<b>7</b>			