



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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and Minor Source Operating Permit (MSOP)

For IDI Fabrication, Inc. in Hamilton County

Permit No. 057-31049-00080

The Indiana Department of Environmental Management (IDEM) has received an application from IDI Fabrication, Inc. located at 14444 Herriman Blvd., Noblesville, IN 46060-4900 for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow IDI Fabrication, Inc. to construct and operate a new stationary insulating plastic materials and films plant.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed or removed. These corrections, changes, and removals may include Title I changes (ex. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Noblesville Public Library
1 Library Plaza
Noblesville, IN 46060-5640

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you

do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number 057-31049-00080 in all correspondence.

Comments should be sent to:

Jack Harmon
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-4228
Or dial directly: (317) 233-4228
Fax: (317)-232-6749 attn: Jack Harmon
E-mail: jaharmon@idem.in.gov

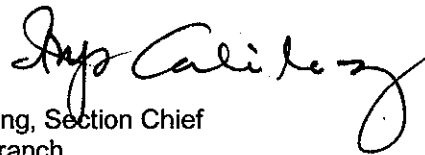
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation and Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251

If you have any questions please contact Jack Harmon or my staff at the above address.



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

(jh)



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DRAFT

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**IDI Fabrication, Inc.
14444 Herriman Blvd
Noblesville, Indiana 46060**

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M057-31049-00080	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

TABLE OF CONTENTS

A. SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	5
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]	
B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability	
B.7 Severability	
B.8 Property Rights or Exclusive Privilege	
B.9 Duty to Provide Information	
B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.14 Permit Renewal [326 IAC 2-6.1-7]	
B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.16 Source Modification Requirement	
B.17 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.19 Annual Fee Payment [326 IAC 2-1.1-7]	
B.20 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	10
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.12 Response to Excursions or Exceedances	

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 16

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

- D.1.1 MSOP [326 IAC 2-6.1]

Annual Notification 17
Malfunction Report 18
Affidavit of Construction 20

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary insulating plastic materials and films plant.

Source Address:	14444 Herriman Blvd, Noblesville, Indiana 46060
General Source Phone Number:	317-776-6577
SIC Code:	3087 (Custom Compounding of Purchased Resins)
County Location:	Hamilton
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Liquid Composite Molding (LCM) Mixer, identified as Mixer 1, approved for construction in 2011, with a maximum throughput capacity of 1,489.29 pounds per hour of compounds which are in liquid form, using no controls, and exhausting indoors. The closed mixer will mix three (3) different resin formulations at a rate of 21 minutes per batch, but has the capability to mix only one formulation at a time. The blended materials are poured out of the mixer by wand.
- (b) Natural gas-fired facility heating units, approved for construction in 2011, with a combined maximum heat input capacity of 1.0 MMBtu/hr, using no controls, and exhausting indoors.
- (c) One (1) deflashing operation, using a hand-held device, and using no controls. This operation has negligible particulate emissions.

SECTION B GENERAL CONDITIONS

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

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 2-1.1-1) 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 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M057-31049-00080, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

B.9 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

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

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M057-31049-00080 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.20 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

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

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

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

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Liquid Composite Molding (LCM) Mixer, identified as Mixer 1, approved for construction in 2011, with a maximum throughput capacity of 1,489.29 pounds per hour of compounds which are in liquid form, using no controls, and exhausting indoors. The closed mixer will mix three (3) different resin formulations at a rate of 21 minutes per batch, but has the capability to mix only one formulation at a time. The blended materials are poured out of the mixer by wand.
- (b) Natural gas-fired facility heating units, approved for construction in 2011, with a combined maximum heat input capacity of 1.0 MMBtu/hr, using no controls, and exhausting indoors.
- (c) One (1) deflashing operation, using a hand-held device, and using no controls. This operation has negligible particulate emissions.

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

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

D.1.1 MSOP [326 IAC 2-6.1]

Pursuant to 326 IAC 2-6.1, in order to confirm the MSOP permit level, the Permittee shall only mix one (1) formulation at a time in the Liquid Composite Molding (LCM) Mixer, identified as Mixer 1.

Compliance with this condition shall ensure that the potential emissions from the source conform to the Minor Source Operating Permit level.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	IDI Fabrication, Inc.
Address:	14444 Herriman Blvd
City:	Noblesville, Indiana 46060
Phone #:	317-776-6577
MSOP #:	M057-31049-00080

I hereby certify that IDI Fabrication, Inc. is:

still in operation.

no longer in operation.

I hereby certify that IDI Fabrication, Inc. is:

in compliance with the requirements of MSOP M057-31049-00080.

not in compliance with the requirements of MSOP M057-31049-00080.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Mail to: Permit Administration and Support Section

Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

IDI Fabrication, Inc.
14444 Herriman Blvd
Noblesville, Indiana 46060

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 IDI Fabrication, Inc. 14444 Herriman Blvd, Noblesville, Indiana 46060, completed construction of the insulating plastic materials and films on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on **Reviewer: Insert date application received at IDEM** and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M057-31049-00080, Plant ID No. 057-00080 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

Source Description and Location	
--	--

Source Name:	IDI Fabrication, Inc.
Source Location:	14444 Herriman Blvd., Noblesville, IN 46060-4900
County:	Hamilton
SIC Code:	3087 (Custom Compounding of Purchased Resins)
Registration No.:	057-31049-00080
Permit Reviewer:	Jack Harmon

On October 20, 2011, the Office of Air Quality (OAQ) received an application from IDI Fabrication, Inc. related to the construction and operation of a new stationary insulating plastic materials and films plant.

Source Definition

IDI Fabrication, Inc. is purchasing some of the equipment and materials of the Industrial Dielectrics, Inc. (Plant ID 057-00042) plant for use in IDI's new plant. The two plants will be approximately 3.6 miles apart. IDEM, OAQ has examined whether the IDI plant is part of the same major source with the existing Industrial Dielectrics, Inc. plant. The term "major source" is defined at 326 IAC 2-7-1(22). In order for two or more plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on contiguous or adjacent properties.

The IDI plant is owned under an employee shared ownership plan (ESOP) with all its shares either employee owned or held in an ESOP trust. The employee owned shares of IDI Fabrication, Inc. are owned by employees of both IDI Fabrication and Industrial Dielectrics. Industrial Dielectrics is a wholly owned subsidiary of Industrial Dielectrics Holding, Inc. The two plants do not have a common owner. The two (2) corporations that own the plants do not have common directors on their board of directors and they do not have corporate officers in common.

IDEM's Nonrule Policy Document Air-005 applies to the definition of "major source" in 326 IAC 2-7-1(22). IDEM's Nonrule Policy Document Air-005 sets out two independent tests to determine if common control exists when there is no common ownership. The first test, the auxiliary activity test, determines whether one source performs an auxiliary activity which directly serves the purpose of the primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. An auxiliary activity directly serves the purpose of a primary activity by supplying a necessary raw material to the primary activity or performing an integral part of the production process for the primary activity.

Day-to-day control of the auxiliary activity by the primary activity may be evidenced by several factors, including:

- Is a majority of the output of the auxiliary activity provided to the primary activity?
- Can the auxiliary activity contract to provide its products/services to a third-party without the consent of the primary activity?

- Can the primary activity assume control of the auxiliary activity under certain circumstances?
- Is the auxiliary activity required to complete periodic reports to the primary activity?

If one or a combination of these questions is answered affirmatively, common control may exist.

The IDI plant will not provide any raw material or perform any service or other work for the Industrial Dielectrics, Inc. plant. Each plant is free to contract with third parties, neither plant can assume control of the other and neither is required to submit periodic reports to the other. The first common control test is therefore not met.

The second common control test in the nonrule policy is the but/for test. This test focuses on whether the auxiliary activity would exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied.

Neither plant will supply any output to the other plant. If either plant were to shut down the other would be able to continue to operate. Therefore the second common control test is also not met. IDEM finds that the two plants are not under common control. Since neither common ownership nor common control exists the first part of the definition of major source is not met.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet.

Both plants produce custom compound resins. Both plants have the two-digit SIC Code 30 for the Major Group Rubber and Miscellaneous Plastics Products.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant.

Neither plant will send any output to the other. Therefore, neither plant is in a support relationship with the other. However, since they have the same two-digit SIC Code, the plants meet the second part of the major source definition.

The IDI plant site is about 3.6 miles from the property housing the Industrial Dielectrics, Inc. plant. There are other properties separating the plants. Since they are not on the same or contiguous properties, IDEM examined whether the plants are on adjacent properties.

The term "adjacent" is not defined in Indiana's air permitting rules. IDEM, OAQ has located a May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality and a U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, that discuss the term "adjacent". These letters are in no way binding on IDEM, OAQ, but they are persuasive in that they illustrate a longstanding analysis used to determine if two sources are "adjacent"; going as far back as the preamble to the 1980 NSR program definition of a source. U.S. EPA's consistent approach is that any evaluation of what is "adjacent" must relate to the guiding principal of a common sense notion of "source".

The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. Some sample questions are:

1. Are materials routinely transferred between the plants?
2. Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
3. Is the production process itself split in any way between the plants?

There are no materials that will be transferred between the plants. The plants have separate managers and separate production staff. The production process itself is not split between the plants. The plants are not close enough to enable them to operate as one source. The plants are therefore not adjacent and do not meet the third part of the major source definition.

Conclusion:

Since the plants do not meet all three parts of the source definition, IDEM, OAQ has determined that the IDI plant is not part of the same major source as the Industrial Dielectrics, Inc. plant. Therefore, IDI Fabrication, Inc. will be issued its own permit.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Hamilton County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
 Basic nonattainment designation effective federally April 5, 2005, for PM_{2.5}.

- (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. Hamilton 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_{2.5}**
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Hamilton County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Hamilton County has been classified as attainment or unclassifiable in Indiana for all other criteria. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by IDI Fabrication, Inc. on October 20, 2011, relating to the construction and operation of a stationary insulating plastic materials and films plant. Additional information was received November 10, and December 2, 2011. This new source consists of the following emission units:

- (a) One (1) Liquid Composite Molding (LCM) Mixer, identified as Mixer 1, approved for construction in 2011, with a maximum throughput capacity of 1,489.29 pounds per hour of compounds which are in liquid form, using no controls, and exhausting indoors. The closed mixer will mix three (3) different resin formulations at a rate of 21 minutes per batch, but has the capability to mix only one at a time. The blended materials are poured out of the mixer by wand.

Note: the maximum capacity is determined as follows: (521.25 lbs per 21 minutes)*(60 minutes/hour) equals 1489.29 pounds per hour. This is based on the worst case scenario of the resin formulations.

- (b) Natural gas-fired facility heating units, approved for construction in 2011, with a combined maximum heat input capacity of 1.0 MMBtu/hr, using no controls, and exhausting indoors.
- (c) One (1) deflashing operation, using a hand-held device, and using no controls. This operation has negligible particulate emissions.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	0.04
PM10 ⁽¹⁾	0.04
PM2.5	0.03
SO ₂	0.00
NO _x	0.44
VOC	15.67
CO	0.37
GHGs as CO ₂ e	528.80

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter

(PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Styrene	5.57E+00
Hexane	7.88E-03
TOTAL HAPs	5.58E+00

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are within the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source would be subject to the provisions of 326 IAC 2-5.1-2 (Registrations). However, the source has requested a Minor Source Operating Permit (MSOP) because of potential future growth. Therefore, the source is subject to the provisions of 326 IAC 2-6.1, and a Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for VOC Emissions for Polymer Manufacturing Industry, 40 CFR 60, Subpart DDD, are not included in the permit, since this source does not manufacture polymers, as defined in 60.561. Therefore, the requirements of 40 CFR 60, Subpart DDD do not apply.
- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Group 1 Polymers and Resins, 40 CFR 63, Subpart U, are not included in the permit, since this source is not a major source of HAPs, and is not a Group 1 manufacturer, as defined in 63.482. Therefore, the requirements of 40 CFR 63, Subpart U do not apply.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Epoxy Resins Production and Non-nylon Polyamides Production, 40 CFR 63, Subpart W, are not included in the permit, since this source is not a major source of HAPs, and does not manufacture epoxy and non-nylon products. Therefore, the requirements of 40 CFR 63, Subpart W do not apply.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Group IV Polymers and Resins, 40 CFR 63, Subpart JJJ, are not included in the permit, since this source is not a major source of HAPs, and is not a Group IV manufacturer, as defined in 63.1312. Therefore, the requirements of 40 CFR 63, Subpart JJJ do not apply.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW, are not included in the permit, since this source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart WWWW do not apply.
- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-3 (Emission Offset) and for PM_{2.5} nonattainment counties 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit all nonattainment regulated pollutants are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the fugitive dust sources do not have potential fugitive particulate emissions greater than 25 tons per year.
- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The Liquid Composite Molding Mixer, Mixer 1, is not subject to the requirements of 326 IAC 6-3-2 because there are no particulate emissions from this operation. Therefore, the provisions of 326 IAC 6-3-2 do not apply.
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each unit at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.
- (k) There are no other 326 IAC 8 Rules that are applicable to the source.

Compliance Determination, Monitoring and Testing Requirements

There are no compliance determination, monitoring, or testing requirements applicable to this source because reasonable emission factors were used in the determination of the emissions for the mixer unit.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 20, 2011. Additional information was received on November 10, December 2, and December 12, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 057-31049-00080. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jack Harmon 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) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Uncontrolled Emissions for Entire Source**

Company Name: IDI Fabrication, Inc.
Address City IN Zip: 14444 Herriman Blvd., Noblesville, IN 46060-4900
Permit Number: 057-31049-00080
Plt ID: 057-00080
Reviewer: Jack Harmon
Date: November, 2011

Uncontrolled Emissions (tons/yr)

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG, as CO2e	Total HAPS	Worst HAP
Mixer 1 (Worst Case)	0.00	0.00	0.00	0.00	0.00	15.64	0.00	0.00	7.06E+00	5.57E+00
Combustion Sources	0.01	0.03	0.03	0.00	0.44	0.02	0.37	528.80	8.27E-03	7.88E-03
Deflashing Operation*	negl.	negl.	negl.	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00
Fugitive Sources	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00
TOTAL UNCONTROLLED EMISSIONS	0.04	0.04	0.03	0.00	0.44	15.67	0.37	528.80	7.07	5.58

Styrene
Hexane

* Deflashing operations are performed using a handheld trimmer, and trim large pieces, with negligible particulate.

Appendix A: Emissions Calculations
Mixer Operations
Uncontrolled VOC & HAP Emissions
Company Name: IDI Fabrication, Inc.
Address City IN Zip: 14444 Herriman Blvd., Noblesville, IN 46060-4900
Permit Number: 057-31049-00080
Plt ID: 057-00080
Reviewer: Jack Harmon
Date: November, 2011

FORMULA 1

Formula Weight (lbs)	493.99	Mixing Time (min)	21.0						
Raw Material	VOC Content (wt. %)	Percent of Total Mixture	Maximum Throughput (lb/hr)	Potential VOC Emissions (lb/hr)	PTE VOC Emissions (tpy)	HAP Flash-Off %	PTE HAP (lb/hr)	PTE HAP (tpy)	
Ship Shape Cleaner	100.0%	0.00%	0.22	0.22	0.96				
Resin Component 1	33.0%	18.22%	257.16	0.85	3.72				
Resin Component 2	67.0%	18.22%	257.16	1.72	7.55				
Styrene	100.0%	5.06%	71.42	0.71	3.13	1.0%	71.42	3.10	Styrene
Modifier H	75.0%	0.11%	1.55	0.01	0.05				
Polymerization Initiator 1	75.0%	0.51%	7.20	0.05	0.24				
Polymerization Initiator 2	0.0%	0.35%	4.94	0.00	0.00				
Polymerization Initiator 3	0.0%	0.00%	0.00	0.00	0.00				
Powder Component 1	0.0%	0.61%	8.61	0.00	0.00				
Filler Component	0.0%	56.28%	794.34	0.00	0.00				
Colorant Component	0.0%	0.61%	8.61	0.00	0.00				
Total FORMULA 1		99.97%			15.64			3.10	

FORMULA 2

Formula Weight (lbs)	449.92	Mixing Time (min)	21.0						
Raw Material	VOC Content (wt. %)	Percent of Total Mixture	Maximum Throughput (lb/hr)	Potential VOC Emissions (lb/hr)	PTE VOC Emissions (tpy)	HAP Flash-Off %	PTE HAP (lb/hr)	PTE HAP (tpy)	
Ship Shape Cleaner	100.0%	0.00%	0.22	0.22	0.96				
Resin Component	33.0%	36.67%	471.39	1.56	6.81				
Styrene	100.0%	3.56%	45.76	0.46	2.00	1.0%	45.76	1.98	Styrene
Modifier H	75.0%	0.11%	1.41	0.01	0.05				
Polymerization Initiator 1	0.0%	0.27%	3.47	0.00	0.00				
Polymerization Initiator 2	0.0%	0.44%	5.66	0.00	0.00				
Polymerization Initiator 3	0.0%	0.00%	0.00	0.00	0.00				
Colorant Component	0.0%	0.67%	8.61	0.00	0.00				
Powder Component 1	0.0%	0.00%	0.00	0.00	0.00				
Filler Component	0.0%	53.34%	685.68	0.00	0.00				
Styrene	100.0%	4.00%	51.42	0.51	2.25	1.0%	51.42	2.23	Styrene
Total FORMULA 2		99.06%			12.08			4.21	

FORMULA 3

Formula Weight (lbs)	521.25	Mixing Time (min)	21.0						
Raw Material	VOC Content (wt. %)	Percent of Total Mixture	Maximum Throughput (lb/hr)	Potential VOC Emissions (lb/hr)	PTE VOC Emissions (tpy)	HAP Flash-Off %*	PTE HAP (lb/hr)	PTE HAP (tpy)	
Ship Shape Cleaner	100.0%	0.00%	0.22	0.22	0.96				
Resin Component 1	33.0%	25.89%	385.58	1.27	5.57				
Resin Component 2	30.0%	8.63%	128.53	0.39	1.69				
Styrene	100.0%	8.63%	128.53	1.29	5.63	1.0%	128.53	5.57	Styrene
Polymerization Initiator 1	75.0%	0.25%	3.72	0.03	0.12				
Polymerization Initiator 2	0.0%	0.41%	6.11	0.00	0.00				
Modifier H	75.0%	0.00%	0.00	0.00	0.00				
Polymerization Initiator 3	0.0%	0.00%	0.00	0.00	0.00				
Flame Retardant Component	0.0%	2.30%	34.25	0.00	0.00				
Powder Component 1	0.0%	0.76%	11.32	0.00	0.00				
Powder Component 2	0.0%	52.57%	782.92	0.00	0.00				
Colorant Component	0.0%	0.38%	5.66	0.00	0.00				
Antimony Compounds	99.5%	0.00%	34.29	0.00	0.00	1.0%	34.29	1.49	Antimony
Total FORMULA 3		99.82%			13.98			7.06	

WORST CASE EMISSIONS FOR VOC, HAPs

Worst Case Total VOC	Worst Case Total HAP	Total Styrene (Worst Case)
15.64	7.06	5.57

Since only one formula can be mixed at a time, PTE is based on the worst case emissions.

Methodology for all Formulation Calculations Above:

VOC Content supplied by source from Material Safety Data Sheets (MSDS)

Percent of Total Mixture and Formula Weight supplied by source.

Maximum throughput (lbs per hour) = Formula Weight (lbs) x 60 minutes/hr / mixing time (minutes) x % of total mixture

*There are no AP-42 emission factors for flash-off for this closed process. IDEM has recognized the use of this emission factor in a letter dated 6/8/1998 from Eugene C. Paik, IDEM, as the best information currently available.

Potential VOC emissions (lb/hr) = Maximum throughput (lb/hr) x VOC Content (wt %)

Potential VOC emissions (tpy) = Potential VOC emissions x 8760 (hrs/yr) / 2000 (lbs/ton)

Potential HAP emissions (lb/hr) = Maximum throughput (lb/hr) x % Content (wt %) x Flash-off (%)

Potential HAP emissions (tpy) = Potential HAP emissions x 8760 (hrs/yr) / 2000 (lbs/ton)

PM/PM10/PM2.5 emissions are not calculated, since Liquid Composite Molding is accomplished with a pouring wand and material is in liquid form; therefore, there are no PM emissions.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: IDI Fabrication, Inc.

Address City IN Zip: 14444 Herriman Blvd., Noblesville, IN 46060-4900

Permit Number: 057-31049-00080

Plt ID: 057-00080

Reviewer: Jack Harmon

Date: November, 2011

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.0	1000	8.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.01	0.03	0.03	0.00	0.44	0.02	0.37

*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 =

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 1-04-006-02

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

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

See page 2 for HAPs emissions calculations.

updated 7/11

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: IDI Fabrication, Inc.

Address City IN Zip: 14444 Herriman Blvd., Noblesville, IN 46060-4900

Permit Number: 057-31049-00080

Plt ID: 057-00080

Reviewer: Jack Harmon

Date: November, 2011

	HAPs - Organics					Totals
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzen 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	9.198E-06	5.256E-06	3.285E-04	7.884E-03	1.489E-05	8.24E-03

	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	2.190E-06	4.818E-06	6.132E-06	1.664E-06	9.198E-06	2.40E-05
				Totals		8.27E-03

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.

updated 7/11

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Greenhouse Gas Emissions****Company Name: IDI Fabrication, Inc.****Address City IN Zip: 14444 Herriman Blvd., Noblesville, IN 46060-4900****Permit Number: 057-31049-00080****Plt ID: 057-00080****Reviewer: Jack Harmon****Date: November, 2011**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
120,000	2.3	2.2	
Potential Emission in tons/yr	526	0.0	0.0
Summed Potential Emissions in tons/yr	525.6		
CO2e Total in tons/yr	528.8		

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).

updated 7/11

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

Company Name: IDI Fabrication, Inc.
Address City IN Zip: 14444 Herriman Blvd., Noblesville, IN 46060-4900
Permit Number: 057-31049-00080
Plt ID: 057-00080
Reviewer: Jack Harmon
Date: November, 2011

Paved Roads Fugitive Dust

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (miles/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Passenger Vehicles entering plants	30.0	1.0	30.0	2.5	75.0	500	0.095	2.8	1036.9
PassengerVehicle leaving plants	30.0	1.0	30.0	2.5	75.0	500	0.095	2.8	1036.9
Truck entering plants	2.5	1.0	2.5	17.5	43.8	500	0.095	0.2	86.4
Truck leaving plants	2.5	1.0	2.5	17.5	43.8	500	0.095	0.2	86.4
Total			65.0		237.5			6.2	2246.7

Average Vehicle Weight Per Trip = $\frac{3.7}{0.09}$ tons/trip
 Average Miles Per Trip = $\frac{3.7}{0.09}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1.3 (12/2011))

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	3.7	3.7	3.7	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m ² = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-2)

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

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.03	0.01	0.00	lbs/mile
Mitigated Emission Factor, $E_{ext} =$	0.02	0.00	0.00	lbs/mile

Process	Unmitigated PTE of PM (tpy)	Unmitigated PTE of PM10 (tpy)	Unmitigated PTE of PM2.5 (tpy)	Mitigated PTE of PM (tpy)	Mitigated PTE of PM10 (tpy)	Mitigated PTE of PM2.5 (tpy)
Passenger Vehicles entering plants	0.01	0.00	0.00	0.01	0.00	0.00
PassengerVehicle leaving plants	0.01	0.00	0.00	0.01	0.00	0.00
Truck entering plants	0.00	0.00	0.00	0.00	0.00	0.00
Truck leaving plants	0.00	0.00	0.00	0.00	0.00	0.00
	0.029	0.006	0.001	0.03	0.01	0.00

Methodology

Total Weight driven per day (ton/day) = Maximum Weight Loaded (tons/trip) x Maximum trips per day (trip/day)
Maximum one-way distance (miles/trip) = Maximum one-way distance (feet/trip) / 5,280 ft per mile
Maximum one-way miles (miles/day) = Maximum trips per year (trip/day) x Maximum one-way distance (miles/trip)
Average Vehicle Weight Per Trip (ton/trip) = \sum (Total Weight driven per day [ton/day]) / \sum (Maximum trips per day [trip/day])
Average Miles Per Trip (miles/trip) = \sum (Maximum one-way miles [miles/day]) / \sum (Maximum trips per year [trip/day])
Unmitigated PTE (tpy) = Maximum one-way miles (miles/yr) x Unmitigated Emission Factor (lbs/mile) / 2,000 lbs per ton
Mitigated PTE (tpy) = Maximum one-way miles (miles/yr) x Mitigated Emission Factor (lbs/mile) / 2,000 lbs per ton



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

January 5, 2012

Scott Doll
IDI Fabrication, Inc.
407 S. 7th Street
Noblesville, IN 46060-2708

Re: Public Notice
IDI Fabrication, Inc.
Permit Level: MSOP
Permit Number: 057-31049-00080

Dear Scott Doll:

Enclosed is a copy of your draft, Minor Source Operating Permit (MSOP), Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Noblesville Public Library, 1 Library Plaza in Noblesville, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Noblesville Star in Noblesville, Indiana publish this notice no later than January 12, 2012.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Jack Harmon, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-4228 or dial (317) 233-4228.

Sincerely,

Pam K. Way
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 5, 2012

Noblesville Star
13095 Publishers Drive
Noblesville, Indiana 46038

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for IDI Fabrication, Inc.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than January 12, 2012.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Pam K. Way at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,
Pam K. Way
Permit Branch
Office of Air Quality

Permit Level: MSOP
Permit Number: 057-31049-00080

Enclosure
PN Newspaper.dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

Thomas W. Easterly
Commissioner

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January 5, 2012

To: Noblesville Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: IDI Fabrication, Inc.
Permit Number: 057-31049-00080

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



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

Notice of Public Comment

January 5, 2012
IDI Fabrication, Inc.
057-31049-00080

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

IDEM Staff	PWAY 1/5/2012 IDI Fabrication Inc. 057-31049-00080 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		Scott Doll IDI Fabrication Inc. 407 S 7th St Noblesville IN 46060-2708 (Source CAATS)									
2		Noblesville City Council and Mayors Office 16 S. 10th St. Noblesville IN 46060 (Local Official)									
3		Hamilton County Health Department 18030 Foundation Dr. #A Noblesville IN 46060-5405 (Health Department)									
4		Hamilton County Board of Commissioners One Hamilton County Square Noblesville IN 46064 (Local Official)									
5		Adam Estes Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Court Zionsville IN 46077 (Consultant)									
6		Noblesville Public Library 1 Library Plaza Noblesville IN 46060 (Library)									
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