



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

TO: Interested Parties / Applicant

DATE: June 26, 2012

RE: Pregis Innovative Packaging / 099 - 31133 - 00028

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 Renewal
OFFICE OF AIR QUALITY**

**Pregis Innovative Packaging
1411 Pidco Drive
Plymouth, Indiana 46563**

(herein known as the Permittee) is hereby authorized to 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.

Operation Permit No.: T099-31133-00028	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 26, 2012 Expiration Date: June 26, 2017

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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(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary packaging materials manufacturing plant.

Source Address:	1411 Pidco Drive, Plymouth, Indiana 46563
General Source Phone Number:	574-936-7065
SIC Code:	3083, 3086
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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)]

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

- (a) Two (2) plank foam extrusion lines, identified as PL-1, and PL-3, constructed in 1998 and 1994 respectively, and one (1) foam sheet extrusion line, identified as BG-1, constructed in 1999, equipped with one (1) regenerative thermal oxidizer, identified as CE03, to control VOC, exhausting to one (1) stack, identified as SC-3. Each extrusion line consists of the following equipment:
- (1) One (1) extruder
 - (2) One (1) foam profile die
 - (3) One (1) permanent total enclosure
 - (4) One (1) common controlled environment storage area.
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 for PL-1, PL-3 and foam sheet extrusion line BG-1, with a maximum process throughput of 1.0 ton/hr, equipped with a cyclone and dust collector in series to control particulates, exhausting indoors.
 - (6) Two (2) scrap grinders, identified as JSP for PL-1, with a maximum throughput of 0.225 tons/hr, and GR-9 for PL-3, with a maximum throughput of 0.30 tons/hr, each grinder equipped with cyclone and dust collector in series to control particulates, exhausting indoors.
 - (7) One (1) scrap grinder, identified as GR-10, approved in 2012 for construction, for foam sheet extrusion line BG-1, with a maximum process throughput of 0.45 tons/hr, equipped with a cyclone and dust collector in series to control particulates, exhausting indoors.
- (b) Two (2) enclosed foam sheet extrusion lines, identified as SL-1, and SL-2, constructed in 1986, and 1987 respectively, equipped with one (1) regenerative thermal oxidizer, identified as CE04,

to control VOC which exhausts to one (1) stack, identified as SC-4. Each foam sheet extrusion line consists of the following equipment:

- (1) One (1) extruder
 - (2) One (1) foam sheet die
 - (3) One (1) permanent total enclosure
 - (4) One (1) oven
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-1 for enclosed foam sheet extrusion lines SL-1 and SL-2, with a maximum process throughput of 0.225 tons/hr, equipped with a cyclone and dust collector in series to control particulates, exhausting indoors.
- (c) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (d) A finished product storage warehouse with emissions uncontrolled.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) One (1) natural gas-fired boiler, rated at 5.0 MMBtu/hr to heat cross- flow ovens; [326 IAC 6-2-4]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2(e)(2)]
 - (1) Four (4) MIG welders
 - (2) One (1) TIG welder
 - (3) One (1) Plasma cutter
 - (4) One (1) oxyacetylene torch
- (c) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than the following thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (1) Grinding and machining operations; [326 IAC 6-3-2(e)(2)]
- (2) Storage silos for plastic pellets; [326 IAC 6-3-2(e)(2)]

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 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, T099-31133-00028, 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.3 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.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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.5 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

- (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.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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. All 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.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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.

- (c) 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).
- (d) 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.11 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, or Northern Regional Office 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

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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)(8) 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.12 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T099-31133-00028 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 permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 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.15 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]

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

- (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.17 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.18 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.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) 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)(1) and (c)(1). 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) and (c)(1).

(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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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.22 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.23 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.24 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 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.7 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. 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.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) 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.

- (b) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required

intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (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.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) 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.12 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.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

- (l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
- (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 - (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
 - (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.14 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.15 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.16 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 retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the Part 70 Operating Permit.Records of required monitoring information include the following:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[40 CFR 64][326 IAC 3-8]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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) 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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) Two (2) plank extrusion lines, identified as PL-1, and PL-3, constructed in 1998 and 1994 respectively, and one (1) foam sheet extrusion line, identified as BG-1, constructed in 1999, equipped with one (1) regenerative thermal oxidizer, identified as CE03, to control VOC, exhausting to one (1) stack, identified as SC-3. Each extrusion line consists of the following equipment:
 - (1) One (1) extruder
 - (2) One (1) foam profile die
 - (3) One (1) permanent total enclosure
 - (4) One (1) common controlled environment storage area
 - (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 for PL-1, PL-3 and foam sheet extrusion line BG-1, with a maximum process throughput of 1.0 tons/hr, equipped with cyclone and dust collector in series to control particulates, exhausting indoors.
 - (6) Two (2) scrap grinders, identified as JSP for PL-1, with a maximum throughput of 0.225 tons/hr, and GR-9 for PL-3, with a maximum throughput of 0.30 tons/hr, each grinder equipped with cyclone and dust collector in series to control particulates, exhausting indoors.
- (b) Two (2) enclosed foam sheet extrusion lines, identified as SL-1, and SL-2, constructed in 1986, and 1987 respectively, equipped with one (1) regenerative thermal oxidizer, identified as CE04 to control VOC which exhausts to one (1) stack identified as SC-4. Each foam sheet line consists of the following equipment:
 - (a) One (1) extruder
 - (b) One (1) foam sheet die
 - (c) One (1) permanent total enclosure
 - (d) One (1) oven
 - (e) One (1) common scrap line with an automated grinder and reclaim, identified as GR-1 for enclosed foam sheet extrusion lines SL-1 and SL-2, with a maximum process throughput of 0.225 tons/hr, equipped with cyclone and dust collector in series to control particulates, exhausting indoors.
- (c) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (d) A finished product storage warehouse with emissions uncontrolled.

(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 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) The total input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (b) The VOC emissions from the two (2) plank foam extrusion lines, identified as PL-1, PL-3, one (1) foam sheet extrusion line, identified as BG-1, the two enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, and finished product storage warehouse, shall not exceed 247.0 tons per twelve (12) consecutive month period.
- (c) The Permittee shall operate the thermal oxidizer, CE03 and CE04 and their respective capture systems with a minimum overall control efficiency of 98% each for the manufacturing process of the foam sheet and plank lines (PL-1, PL-3, BG-1, SL-1 and SL-2), and overall control efficiency of 95% each for the scrap lines at all times that any of the associated processes are in operation.

Compliance with the above requirements, in conjunction with the unrestricted potential VOC emissions from all other activities at this source, shall ensure that the source-wide VOC emissions are limited to less than 250 tons per twelve consecutive month period with compliance determined at the end of each month, rendering the requirements of 326 IAC 2-2 not applicable.

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to Part 70 Operating Permit Renewal No.: T099-17908-00028, issued, on September 5, 2007, and 326 IAC 8-1-6 the Best, Available Control Technologies (BACT) for the plank extrusion lines and foam sheet extrusion lines was use of regenerative oxidizers CE03 and CE04 and their respective capture systems.

- (a) Regenerative oxidizers, identified as CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and each must have an overall control efficiency of 95% destruction efficiency for the scrap lines.
- (b) Regenerative oxidizers, identified as CE03 and CE04 and their respective capture systems shall each operate at all times when the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, and the two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, are in operation to demonstrate compliance with the VOC limit of 249.0 tons per twelve (12) consecutive month period.
- (c) VOC emissions from the finished product storage warehouse are not included in this control requirement. The uncontrolled VOC emissions from the finished product storage warehouse are accounted for using a Mass Balance Methodology based on retention data as described in Condition D.1.9(c).

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from grinders used in the extrusion lines shall be limited as follows:

Grinder Designation	Process Weight Rate, tons/hr	Allowable particulate emissions (lb/hr)
GR-1	0.225	1.51
JSP	0.225	1.51
GR-9	0.30	1.83
GR-8	1.0	4.10
GR-10	0.45	2.40

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to 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)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate the compliance status with conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE04 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) In order to demonstrate the compliance status with conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing for the regenerative thermal oxidizer CE03 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (c) Retention data will be used with the mass balance model to calculate actual emissions and the potential to emit (PTE). Retention testing will be performed on the family of products as classified in the mass balance model. Retention testing will be performed when there is a significant change in the process or there is a new product family. The Permittee will submit the testing to IDEM, OAQ for approval.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.7 Particulate (PM)

In order to comply with condition D.1.3, the cyclone and dust collectors for PM, PM₁₀ and PM_{2.5} control shall be in operation and control emissions from the grinders at all times when SL-1, SL-2, PL-1, BG-1, and PL-3 are in operation.

D.1.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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.

D.1.9 Volatile Organic Compounds (VOC)

In order to comply with condition D.1.2, the following shall apply:

When operating:

- (a) Regenerative oxidizers, identified as CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test that achieves a destruction efficiency of 98% for the manufacturing process of the foam sheet and plank lines and 95% destruction efficiency for the scrap lines.
- (b) The capture system associated with CE03 shall be maintained as follows:
 - (1) The owner or operator shall maintain the minimum capture system differential pressure at negative 0.007 inches of water difference between the inside and outside of the permanent total enclosure.
- (c) Retention data will be used with the mass balance model to calculate actual emissions and the potential to emit (PTE). Retention testing will be performed on the family of products as classified in the mass balance model. Retention testing will be performed when there is a significant change in the process or there is a new product family. The Permittee will submit the testing to IDEM, OAQ for approval.

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

D.1.10 Regenerative Thermal Oxidizer and Capture System Operations [40 CFR 64]

- (a) Regenerative oxidizers, identified as CE03 and CE04 and their respective capture systems shall each operate at all times SL-1, SL-2, PL-1, PL-3, and BG-1 are in operation to demonstrate compliance with the VOC limit of 247 tons per twelve (12) consecutive month period.
- (b) When operating, CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test, in order for CE03 and CE04 and their respective capture systems to each maintain an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and an overall control efficiency of 95% for the scrap lines.
- (c) The Permittee shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in condition D.1.2. The operation of this device can allow for brief periods of time when temperature is not recorded to allow for a change of the recording media.
- (d) This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.
- (e) The Permittee shall measure the differential pressure of the permanent total enclosure (PTE) capture systems associated with the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, and the two (2) foam sheet extrusion

lines, identified as SL-1 and SL-2, daily when these facilities are in operation in order for each to maintain an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and an overall control efficiency of 95% for the scrap lines.

- (f) The differential pressure of the PTE capture system shall be observed at least once per day when the thermal oxidizers are in operation. When for any two consecutive required once per day pressure readings, the differential pressure is below the normal indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE capture system, the Permittee shall take reasonable response steps. A reading that is below the indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE capture system is not a violation of the permit. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available not later than 30 days of the end of each compliance period.
- (1) The VOC content by weight of the blowing agent in all stages of the processes (winder, warehouse finished goods and scrap recycling). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Spreadsheet data shall be maintained to demonstrate how the VOC contents were determined;
 - (2) A log of the dates of use;
 - (3) The total blowing agent usage for each month; and
 - (4) Monthly emissions in pounds of VOC.
- (b) Continuous readings of the operating temperature shall be maintained to document the compliance status with Condition D.1.10.
- (c) Once per day readings of the negative pressure at the inlet of the capture system shall be maintained to document the compliance status with Condition D.1.10. The Permittee shall include in its daily record when a pressure reading is not taken and the reason for the lack of a pressure reading (e.g. the process did not operate that day).
- (d) Records of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE03 and CE04) which result in violations of the Office of Air Quality rules shall be kept for a period of three (3) years and made available to OAQ upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAQ no later than four (4) daytime business hours after the occurrence.
- (e) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, 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 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).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities:

- (a) One (1) natural gas-fired boiler, rated at 5.0 MMBtu/hr, approved in 2012 for construction to heat cross-flow ovens in building No. 1; [326 IAC 6-2-4].
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2(e)(2)].
 - (1) Four (4) MIG welders
 - (2) One (1) TIG welder
 - (3) One (1) Plasma cutter
 - (4) One (1) oxyacetylene torch
- (c) Other activities or categories not previously identified as follows:
 - Insignificant Thresholds: Activities with emissions equal to or less than the following thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day
Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day
Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day
Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day
 - (1) Grinding and machining operations; [326 IAC 6-3-2(e)(2)].
 - (2) Storage silos for plastic pellets; [326 IAC 6-3-2(e)(2)].

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 the particulate matter emissions from the 5.0 MMBtu/ hr boiler shall not exceed 0.6 lb/MMBtu.

D.2.2 Particulate [326 IAC 6-3-2(e)(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. This limit applies to the following insignificant activities:

- (a) The equipments related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Storage silos for plastic pallets.
- (c) Grinding and machining operations.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the Preventive Maintenance Plan required by this condition.

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

Source Name: Pregis Innovative Packaging
Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-31133-00028

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: Pregis Innovative Packaging
Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-31133-00028

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 ₂ , VOC, NO _x , 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: Pregis Innovative Packaging
 Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
 Part 70 Permit No.: T099-31133-00028
 Facility: Entire Source
 Parameter: VOC PTE (blowing agent usage)
 Limit: The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Blowing Agent Usage This Month (tons)	VOC Blowing Agent Usage Previous 11 Months (tons)	12 Month Total VOC Blowing Agent Usage (tons)
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: _____

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**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: Pregis Innovative Packaging
 Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
 Part 70 Permit No.: T099-31133-00028

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Addendum to the Technical Support Document (ATSD) for a
Part 70 Operating Permit Renewal**

Source Background and Description

Source Name:	Pregis Innovative Packaging, Inc.
Source Location:	1411 Pidco Drive, Plymouth, Indiana 46563
County:	Marshall
SIC Code:	3083, 3086
Permit Renewal No.:	T099-31133-00028
Permit Reviewer:	Swarna Prabha

On May 7, 2012, the Office of Air Quality (OAQ) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Pregis Innovative Packaging, Inc. had applied for a renewal to its Part 70 Operating Permit, issued on September 5, 2007. The notice also stated that the OAQ proposed to issue a renewal and provided information on how the public could review the proposed permit 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 should be issued as proposed.

Comments and Responses

On May 9, 2012, Pregis Innovative Packaging, Inc. submitted comments to IDEM, OAQ on the draft permit.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~struck~~ and new language **bolded**.

Comment 1:

In Condition A.2(b)(4), there is currently only one oven in use at the facility. This reference to only one oven is already properly provided in the emission unit description in Section D.1 on page 25. However, the equipment listing in the TSD in Condition (b)(4) on page 2 should also be revised to show only one oven.

Response to Comment 1:

IDEM agrees with the recommended changes. The permit Condition A.2(b)(4) has been revised 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:

...

- (b) Two (2) enclosed foam sheet extrusion lines, identified as SL-1, and SL-2, constructed in 1986, and 1987 respectively, equipped with one (1) regenerative thermal oxidizer, identified as CE04, to control VOC which exhausts to one (1) stack, identified as SC-4. Each foam sheet extrusion line consists of the following equipment:

...

- (4) ~~Two~~ **One (21)** ovens

Comment 2:

In Condition A.3(b)(4), the term "torch" should be added after the existing phrase "One (1) Oxyacetylene" to better clarify this emission unit.

Response to Comment 2:

IDEM agrees with the recommended changes. In the permit Condition A.3(b)(4), the term "torch" has been added after the existing phrase "One (1) Oxyacetylene".

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- ...
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2(e)(2)]
- ...
- (4) One (1) oxyacetylene **torch**
 - ~~(5) Torch~~

Comment 3:

In the Insignificant Activities list on page 4 of the TSD, the phrase "VOC emissions from the customer scrap recycling process" should be removed from Condition (i)(5) since this activity no longer occurs at the facility.

Response to Comment 3:

IDEM agrees with the recommended changes. IDEM, OAQ does not make any changes to the original TSD. No change was made to the Permit because this is an unregulated insignificant activity that is not listed in the Permit.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Description and Location
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Source Name:	Pregis Innovative Packaging, Inc.
Source Location:	1411 Pidco Drive, Plymouth, Indiana 46563
County:	Marshall
SIC Code:	3083, 3086
Permit Renewal No.:	T099-31133-00028
Permit Reviewer:	Swarna Prabha

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Pregis Innovative Packaging, Inc. relating to the operation of a stationary packaging materials manufacturing plant. On November 10, 2011, Pregis Innovative Packaging, Inc. submitted an application to the OAQ requesting to renew its operating permit. Pregis Innovative Packaging, Inc. was issued its first Part 70 Operating Permit Renewal (T099-17908-00028) on September 5, 2007.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and control devices:

- (a) Two (2) plank foam extrusion lines, identified as PL-1, and PL-3, constructed in 1998 and 1994 respectively, and one (1) foam sheet extrusion line, identified as BG-1, constructed in 1999, equipped with one (1) regenerative thermal oxidizer, identified as CE03, to control VOC, exhausting to one (1) stack, identified as SC-3. Each extrusion line consists of the following equipment:

- (1) One (1) extruder
- (2) One (1) foam profile die
- (3) One (1) permanent total enclosure

NOTE: As part of the First Part 70 Operating Permit Renewal No. T099-17908-00028, issued on September 5, 2007, it was determined that buildings 8 and 9 (housing curing ovens) meet the requirements for a permanent total enclosure (PTE) based on a Method 204 analysis that was conducted for Pregis on August 11, 2004.

- (4) One (1) common controlled environment storage area.

NOTE: The foam may be stored in a controlled environment consisting of storing recently extruded foam at elevated temperatures, referred to as Work in Progress (WIP). These areas are referred to as Buildings 8 and 9 common controlled environment storage areas. VOC emissions from the foam stored in these buildings are controlled by an existing thermal oxidizer (CE03).

- (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-8 for PL-1, PL-3 and foam sheet extrusion line BG-1, with a maximum process throughput of 1.0 ton/hr, equipped with a cyclone and dust collector in series to control particulates, exhausting indoors.
- (6) Two (2) scrap grinders, identified as JSP for PL-1, with a maximum throughput of 0.225 tons/hr, and GR-9 for PL-3, with a maximum throughput of 0.30 tons/hr, each grinder equipped with cyclone and dust collector in series to control particulates, exhausting indoors.
- (7) One (1) scrap grinder, identified as GR-10, approved in 2012 for construction, for foam sheet extrusion line BG-1, with a maximum process throughput of 0.450 tons/hr, equipped with a cyclone and dust collector in series to control particulates, exhausting indoors.

NOTE: The Grinder GR-10 is considered an insignificant activity because particulate emissions are less than 5 lbs/day.

- (b) Two (2) enclosed foam sheet extrusion lines, identified as SL-1, and SL-2, constructed in 1986, and 1987 respectively, equipped with one (1) regenerative thermal oxidizer, identified as CE04, to control VOC which exhausts to one (1) stack identified as SC-4. Each foam sheet extrusion line consists of the following equipment:
 - (1) One (1) extruder
 - (2) One (1) foam sheet die
 - (3) One (1) permanent total enclosure
 - (4) Two (2) ovens

NOTE: Heat to the ovens is provided by the 5.0 MMBtu/hr natural gas-fired boiler.

- (5) One (1) common scrap line with an automated grinder and reclaim, identified as GR-1 for enclosed foam sheet extrusion lines SL-1 and SL-2, with a maximum process throughput of 0.225 tons/hr, equipped with a cyclone and dust collector in series to control particulates, exhausting indoors.
- (c) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (d) A finished product storage warehouse with emissions uncontrolled.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit
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The source has constructed following insignificant emission unit since the existing TVOP was issued on September 5, 2007.

- (a) One (1) natural gas-fired boiler, rated at 5.0 MMBtu/hr, to heat cross-flow ovens.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following insignificant emission units:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including one (1) parts washers which are cold cleaner degreasers without remote solvent reservoirs. [326 IAC 8-3-2] [326 IAC 8-3-5]

NOTE: The source has replaced this unit with a new organic chemical used in the degreaser to a non-VOC and non-HAP containing citric acid-based cleaning solution.

- (b) One (1) bubble pack wrap line.
- (c) One (1) maintenance parts washer.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment.
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

Insignificant Activities

The source also consists of the following insignificant activities as defined in 326 IAC 2-7-1(21).

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) Nine (9) natural gas-fired furnaces, each rated at 0.4 MMBtu per hour.
 - (2) Two (2) natural gas-fired furnaces, each rated at 0.58 MMBtu per hour.
 - (3) Five (5) natural gas-fired furnaces, each rated at 0.1 MMBtu per hour.
 - (4) One (1) natural gas-fired boiler, rated at 5.0 MMBtu/hr, to heat cross-flow ovens.
- (b) Non VOC degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including one (1) parts washers which are cold cleaner degreasers without a remote solvent reservoirs.

NOTE: The source has replaced this unit with a new organic solvent used in the degreaser to a non-VOC and non-HAP containing citric acid-based cleaning solution. Therefore, 326 IAC 8-3 rules no longer apply to this unit.

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(e)(2)]
 - (1) Four (4) MIG welders
 - (2) One (1) TIG welder
 - (3) One (1) Plasma cutter
 - (4) One (1) oxyacetylene

NOTE: The source requests that the existing welding and cutting operations, as well as potential emissions, be included in this permit renewal.

- (d) Closed loop heating and cooling systems.
- (e) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (f) Paved and unpaved roads and parking lots with public access.

- (g) Enclosed conveyance systems for transport of plastic raw materials and plastic finished goods.
- (h) Water based hot melt glue adhesive.
- (j) Other activities or categories not previously identified meeting the following criteria:

Insignificant Thresholds: Activities with emissions equal to or less than the following thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (1) Two (2) bubble pack wrap lines;
- (2) Heat seal on bubble pack;
- (3) Two (2) Kraft paper package mailer lines;
- (4) Four (4) Plank laminator;
- (5) VOC emissions from the customer scrap recycling process;
- (6) Grinding and machining operations; [326 IAC 6-3-2(e)(2)];
- (7) Storage silos for plastic pellets; [326 IAC 6-3-2(e)(2)]; and
- (8) Heat seal bars.

Emission Units and Pollution Control Equipment Added

The following insignificant activities are being added during this renewal process:

- (a) One (1) natural gas-fired boiler, rated at 5.0 MMBtu/hr, to heat cross-flow ovens.
- (b) Three (3) plank laminators, approved in 2012 for construction;
- (c) One (1) bubble laminator in building No. 6, approved in 2012 for construction;
- (d) One (1) foam pouch line, approved in 2012 for construction;
- (e) Two (2) bubble out bag lines, approved in 2012 for construction;
- (f) Ink printers on multiple production lines; water based flexographic printing stations; and

NOTE: The emission calculations are included based on worst case inks and solvents used in the process.

- (g) Water-based hot melt glue adhesive.

NOTE: The water-based hot melt glue replaces the existing water based adhesive which contained VOC.

Existing Approvals

Part 70 Operating Permit Renewal No.: T099-17908-00028 was issued on September 5, 2007. The source has not received any additional approvals since the Part 70 Operating Permit Renewal was issued.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 Operating Permit Renewal:

- (1) Title 1 change: The following Condition D.1.1 has been revised as follows to allow for uncontrolled VOC emission from newly constructed emission units and to maintain source-wide VOC emission below 250 tons per year:

D.1.1 PSD Minor Limit [326 IAC 2-2]

- ~~(a) The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.~~
- ~~(b) The thermal oxidizers CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines (PL-1, PL-3, BG-1, SL-1 and SL-2), and each must have an overall control efficiency of 95% for the scrap lines.~~

~~This input limitation along with operation of the regenerative thermal oxidizers, identified as CE03 and CE04, at all times that the plank extrusion lines and the foam sheet extrusion lines are in operation shall result in equivalent VOC emissions from the extrusion lines and the uncontrolled finished product storage warehouse of 249 tons per twelve (12) consecutive month period. The potential to emit (PTE) of VOC for the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.~~

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) The total input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.**
- (b) The VOC emissions from the two (2) plank foam extrusion lines, identified as PL-1, PL-3, one (1) foam sheet extrusion line, identified as BG-1, the two enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, and finished product storage warehouse, shall not exceed 247.0 tons per twelve (12) consecutive month period.**
- (c) The Permittee shall operate the thermal oxidizer, CE03 and CE04 and their respective capture systems with a minimum overall control efficiency of 98% each for the manufacturing process of the foam sheet and plank lines (PL-1, PL-3, BG-1, SL-1 and SL-2), and overall control efficiency of 95% each for the scrap lines at all times that any of the associated processes are in operation.**

Compliance with the above requirements, in conjunction with the unrestricted potential VOC emissions from all other activities at this source, shall ensure that the source-wide

VOC emissions are limited to less than 250 tons per twelve consecutive month period with compliance determined at the end of each month, rendering the requirements of 326 IAC 2-2 not applicable.

Reason revised: In order to render the requirements of 326 IAC 2-2 not applicable, the VOC limit is revised from 249.0 tons to 247.0 tons per twelve consecutive month period during this renewal for extrusion lines BG-1, PL-1 and PL-3, SL-1, SL-2 and the storage warehouse. There are VOC emissions from other insignificant activities; 5.0 MMBtu/hr boiler and flexographic ink printing operations added during this renewal.

- (2) The source has requested to remove Condition D.1.8(b)(B) because the requirement is duplicative of Condition D.1.8(b)(A), which requires Pregis to comply with the minimum capture system differential pressure value of 0.007 inches of water between the inside and outside of the permanent total enclosure.

D.1.8 Volatile Organic Compounds (VOC) [~~326 IAC 8-1-6~~]

Pursuant to CP No. 099-9807-00028, issued on October 29, 1998, and Significant Source Modification 099-16015-00028, issued on October 22, 2002, and in order to comply with condition D.1.2 the following shall apply:

When operating:

- (a) CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test that achieves a destruction efficiency of 98% for the manufacturing process of the foam sheet and plank lines and 97% destruction efficiency for the scrap lines.
- (b) the capture system associated with CE03 shall be maintained as follows:
- ...
- ~~(B) Upon completion of all subsequent performance tests, the owner or operator shall maintain the minimum capture system differential pressure established by the most recent performance test.~~
- ...
- (3) The source has requested to remove the phrase in Condition D.1.9(f) since Pregis is already required to comply with the minimum capture system differential pressure value of 0.007 inches of water as stated in Conditions D.1.8(b)(A) between the inside and outside of the permanent total enclosure. The phrase "or a level established in the most recent compliance stack test" is removed from Condition D.1.9(f).

D.1.10 Regenerative Thermal Oxidizer and Capture System Operations [40 CFR 64]

- ...
- (f) The differential pressure of the PTE capture system shall be observed at least once per day when the thermal oxidizers are in operation. When for any two consecutive required once per day pressure readings, the differential pressure is below the normal indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE capture system ~~or a level 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 below the indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE capture system or a level 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.
- (4) The following conditions have been removed from the permit because the source has changed the method of operation, and the solvent used in the degreasing unit is an organic solvent based

100% citric acid solution, containing no VOC and no HAPs. Therefore, 326 IAC 8-3 rules no longer apply to this unit. The following Conditions, D.2.1 and D.2.2 have been removed and Section D.2 Conditions have been renumbered accordingly:

~~D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:~~

- ~~(a) Equip the cleaner with a cover;~~
- ~~(b) Equip the cleaner with a facility for draining cleaned parts;~~
- ~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~
- ~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~
- ~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~
- ~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

~~D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]~~

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:~~

- ~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - ~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~
 - ~~(B) The solvent is agitated; or~~
 - ~~(C) The solvent is heated.~~~~
- ~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~
- ~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
- ~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~
- ~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)~~

~~millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~

~~(A) — A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~

~~(B) — A water cover when solvent is used is insoluble in, and heavier than, water.~~

~~(C) — Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

~~(b) — Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of cold cleaner degreaser operations without remote solvent reservoirs construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:~~

~~(1) — Close the cover whenever articles are not being handled in the degreaser.~~

~~(2) — Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

~~(3) — Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marshall County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, 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.
Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Marshall County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} 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_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5} and SO₂ 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**
 Marshall 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Greater than 100, less than 250
PM ₁₀	Greater than 100, less than 250
PM _{2.5}	Greater than 100, less than 250
SO ₂	< 100
VOC	> 250
CO	< 100
NO _x	< 100
GHG as CO ₂ e	< 100,000
Single HAP	< 10
Total HAP	< 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀ [*]	PM _{2.5} ^{**}	SO ₂	NO _x	VOC	CO	GHG ^{***}	Total HAPs	Worst Single HAP
Two (2) enclosed foam sheet extrusion lines SL-1, SL-2	0	0	0	0	0		0	0	--	--
Two (2) Finished product storage warehouse	0	0	0	0	0		0	0	--	--
Printing operation	0	0	0	0	0	1.212	0	0	0	negl.
Grinders, JSP, GR8, GR9, GR10, GR1	153.17	153.17	153.17	0	0	0	0	0	0	negl.
Insignificant Activities										
Resin Unload, Pallet handling, storage Silo filling, reclaim	0.5	0.5	0.5	0	0	0	0	0	0	0
Natural gas furnaces	0.04	0.18	0.18	0.01	2.3	0.13	1.94	5425.47	0.085	0.08
Natural gas Boiler	0.04	0.17	0.17	0.01	2.19	0.12	1.84			
Welding	2.14	2.14	2.14	0	0	0	0	0	negl.	negl.
Total PTE of Entire Source	155.90	156.16	156.16	0.03	4.49	<248.46	3.77	5425.47	0.085	0.08
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
<i>negl. = negligible</i> <i>*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".</i> <i>**PM_{2.5} listed is direct PM_{2.5}.</i> <i>(1) To render the requirements of 326 IAC 2-2 not applicable, the VOC emission Cap limit is revised from 249.0 tons/yr to 247.0 tons /yr during this renewal for extrusion lines BG-1, PL-1 and PL-3, SL-1, SL-2 and storage warehouse, to ensure that the source-wide VOC emissions are less than 250 tons/yr per 12 consecutive month period.</i> <i>*** Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gas (GHG) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO₂ equivalent (CO₂e) emissions. Therefore, CO₂e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO₂e per year</i>										

This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHG, are less than two hundred fifty (<250) tons per year, emissions of GHG are less than one hundred thousand (<100,000) tons of CO₂ equivalent (CO₂e) emissions per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the 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 existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
BG-1 - VOC	BG-1 - VOC	Y	828.18	6.82	100	Y	N
PL-1 - VOC	Oxidizer CE-03	Y	116.31	3.26	100	Y	N
PL-3 - VOC	BG-1 - VOC	Y	116.31	3.26	100	Y	N
SL-1 - VOC	Thermal Oxidizer CE-04	Y	542.27	9.85	100	Y	N
SL-2 - VOC	Thermal Oxidizer CE-04	Y	542.27	9.85	100	Y	N
Finished product warehouse -VOC	None	N	158.26	158.26	100	N	N
GR-9 - PM10	Cyclone/dust collector	N	48.05	0.48	100	N	N
JSP - PM10	Cyclone/dust collector	N	48.05	0.48	100	N	N
GR-8 - PM10	Cyclone/dust collector	N	48.05	0.48	100	N	N
GR-1 - PM10	Cyclone/dust collector	N	4.51	0.045	100	N	N
GR-10 - PM10	Cyclone/dust collector	N	4.51	0.045	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the one (1) foam sheet extrusion line, identified as BG-1, two (2) plank foam extrusion lines, identified as PL-1, PL-3, and which are controlled by the regenerative thermal oxidizer identified as CE03, and the two (2) foam sheet extrusion lines, identified as SL-1 and SL-2, which are controlled by the regenerative thermal oxidizer identified as CE04 for VOC.

The two (2) plank extrusion lines, identified as identified as PL-1, PL-3, and one (1) foam sheet extrusion line, BG-1, controlled by the regenerative thermal oxidizer, identified as CE03 and the two (2) foam sheet extrusion lines, identified as SL-1 and SL-2, controlled by the regenerative thermal oxidizer, identified as CE04 are not "large units" since the potential to emit of VOC after control is less than 100 tons per year for each. Therefore, pursuant to 40 CFR 64.5(b), the Permittee was required to submit a CAM plan as part of the Title V renewal application. The Permittee previously did submit CAM plans for CE03, CE04 and other emission units as part of the Title V first renewal application and there have been no changes affecting the CAM requirements.

The Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels) are not included in this permit for the insignificant two (2) 12,000 gallon blowing agent storage tanks for which Construction, Reconstruction, or Modification Commenced After July 23, 1984, because each storage tank has a capacity of less than 75 cubic meters.
- (b) The requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110, Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978); or 40 CFR 60.110a, Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984) are not included in the permit for the two (2) 12,000 gallon blowing agent storage tanks because the storage tanks store blowing agent is not petroleum liquid. The tanks were brought to their present location in 1986, which is after the May 19, 1978 applicability date for Subpart K, and falls after the May 18, 1978 and prior to July 23, 1984 applicability date for Subpart Ka. Also, the storage capacity of each tank is less than the applicability threshold of 40,000 gallons for Subpart K and Subpart Ka.
- (c) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR 63.11194, Subpart JJJJJJ), are not included in this permit because the one (1) natural gas-fired boiler is natural gas fired boiler only.
- (d) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40CFR 63.7485, Subpart DDDDD), are not included in this permit because the one (1) natural gas-fired boiler, and process heaters are not part of a major source of HAP.
- (e) The natural gas-fired boilers are not subject to the requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, because the boiler has a rated heat capacity less than 10 MMBtu per hour.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit renewal.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20 and 40 CFR Part 63, Subpart U, National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins were not included in this permit for this source because the source does not include any elastomer product process units (EPPU) as defined in the rule and the source is not a major source of HAPs.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20 and 40 CFR Part 63, Subpart JJJ, National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins were not included in this permit for this source because the source does not include any thermoplastic product process units (TPPU) as defined in the rule and the source is not a major source of HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20 and 40 CFR Part 63, Subpart III, National Emission Standards

for Hazardous Air Pollutant Emissions for flexible Polyurethane Foam production is not included in this permit for this source because the source does not produce flexible polyurethane or rebond foam.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20 and 40 CFR Part 63, Subpart M, National Emission Standards for Hazardous Air Pollutants Emissions: Flexible Polyurethane Foam Fabrication Operations are not included in this permit for this source because the source does not operate flexible polyurethane foam fabrication plant and is not a major source of HAPs.
- (e) The insignificant degreasing activities are not subject to the requirements of the NESHAP for Halogenated Solvent Cleaning (40 CFR 63, Subpart T) because this source does not use halogenated HAP solvents.
- (f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

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, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM₁₀ is less than 250 tons per year; and the potential to emit of CO, NO_x, and SO₂ is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(b)(1), an emission statement shall be submitted by July 1, 2013, and every three (3) year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6-4 (Fugitive Dust Emissions)
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 6.5 (PM Limitations Except Lake County)
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (PM Limitations for Lake County)
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State Rule Applicability – Plank Extrusion Lines PL-1, PL-3, and Foam Sheet Extrusion Lines BG-1, SL-1 and SL-2

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

Pursuant to Part 70 Operating Permit Renewal No.: T099-17908-00028, and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable to this polystyrene foam extrusion process, the following shall apply:

- (a) The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from the two (2) plank foam extrusion lines, identified as PL-1, PL-3, one (1) foam sheet extrusion line, identified as BG-1, the two enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, and finished product storage warehouse, shall not exceed 247.0 tons per twelve (12) consecutive month period.

NOTE: To render the requirements of 326 IAC 2-2 not applicable, the VOC emission limit is revised from 249.0 tons/yr to 247.0 tons /yr during this renewal for extrusion lines BG-1, PL-1 and PL-3, SL-1, SL-2 and storage warehouse. The limitation has been adjusted to compensate for the uncontrolled potential emissions from insignificant activities not previously account for (one (1) 5.0 MMBtu/hr boiler and flexographic ink printing operations).

- (c) The Permittee shall operate the thermal oxidizer, CE03 and CE04 and their respective capture systems with a minimum overall control efficiency of 98% each for the manufacturing process of the foam sheet and plank lines (PL-1, PL-3, BG-1, SL-1 and SL-2), and overall control efficiency of 95% each for the scrap lines at all times that any of the associated processes are in operation.

Compliance with the above requirements, in conjunction with the unrestricted potential VOC emissions from all other activities at this source, shall ensure that the source-wide VOC emissions are limited to less than 250 tons per twelve consecutive month period with compliance determined at the end of each month, rendering the requirements of 326 IAC 2-2 not applicable.

326 IAC 8-1-6 (New facilities; general reduction requirements)

- (a) Pursuant to Part 70 Operating Permit Renewal No. T099-17908-00028, issued on September 5, 2007, the Best Available Control Technologies (BACT) for the plank extrusion lines and foam sheet extrusion lines was use of regenerative oxidizers CE03 and CE04 and their respective capture systems. CE03 and CE04 and their respective capture systems must each have an overall control efficiency of 98 % for the manufacturing process and must each have an overall control efficiency of 95% for the scrap lines.

(1) When operating:

- (A) CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test that achieves a destruction efficiency of 98% for the manufacturing process of the foam sheet and plank lines and 95% destruction efficiency for the scrap lines.
- (B) the capture system associated with CE03 shall be maintained as follows:

- (i) The owner or operator shall maintain the minimum capture system differential pressure at negative 0.007 inches of water difference between the inside and outside of the permanent total enclosure.
 - (ii) Upon completion of all subsequent performance tests, the owner or operator shall maintain the minimum capture system differential pressure established by the most recent performance test.
- (2) CE03 and CE04 and their respective capture systems shall each operate at all times while associated production lines are in operation to demonstrate compliance with the VOC limit of 249.0 tons per twelve (12) consecutive month period.
- (b) Retention data will be used with the mass balance model to calculate actual emissions and the potential to emit (PTE). Retention testing will be performed on the family of products as classified in the mass balance model. Retention testing will be performed when there is a significant change in the process or there is a new product family. The Permittee will submit the testing to IDEM, OAQ for approval.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The polystyrene process commenced operation after January 1, 1980; therefore, the requirements of 326 IAC 8-6 are not applicable.

State Rule Applicability – Natural Gas Combustion 5.0 MMBtu/hr boiler and Furnaces

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)
Pursuant to 326 IAC 6-2-4 the particulate matter emissions from the 5.0 MMBtu/ hr boiler shall not exceed 0.6 lb/MMBtu, since it has a maximum operating capacity rating of less than 10 MMBtu/hr and began operation after September 21, 1983 and it is a source of indirect heating.

The emission limitations are based on the following equation given in 326 IAC 6-2-4(a):

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facilities permit application, except when some lower capacity is contained in the facilities operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the boiler is 5.0 million British thermal units per hour.

$$Pt = 1.09/(5)^{0.26} = 0.717 \text{ lb/MMBtu heat input}$$

PTE PM = (0.04 ton/yr PM)*(2000 lb/ton) / [(8760 hr/yr)*(5.0 MMBtu/hr)] = 0.0019 lb/MMBtu.
Since 0.00019 lbs/MMBtu emission rate estimated using the AP-42 emission factor is less than the limit of 0.6 lb/MMBtu, the boiler is able to comply with 326 IAC 6-2-4(a).

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired ovens and furnaces, are not subject to 326 IAC 6-2 as they are not sources of indirect heating.

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

All other insignificant natural gas combustion units each have potential PM emissions less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), these emission units are exempt from the requirements of 326 IAC 6-3-2.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired heat ovens and furnaces each are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

326 IAC 10 (Nitrogen Oxide Rules)

- (a) This source is located in Marshall County. Therefore, pursuant to 326 IAC 10-1-1(a), the requirements of 326 IAC 10-1 (Nitrogen Oxide Controls in Clark and Floyd Counties) are not applicable.
- (b) This source is not specifically listed in 326 IAC 10-3-1. Therefore, the requirements of 326 IAC 10-3-1 (Nitrogen Oxide Reduction Program for Specific Source Categories) are not applicable.
- (c) The boiler, is not electricity generating unit. Therefore, pursuant to 326 IAC 10-4-1(a), the requirements of 326 IAC 10-4 (Nitrogen Oxides Budget Trading Program) are not applicable.

State Rule Applicability - Grinders

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

- (a) Pursuant to 326 IAC 6-3-2, the particulate from grinders used in the extrusion lines shall be limited as follows:

Grinder Designation	Process Weight Rate, tons/hr	Allowable particulate emissions (lb/hr)
GR-1	0.225	1.51
JSP	0.225	1.51
GR-9	0.30	1.83
GR-8	1.0	4.10
GR-10	0.45	2.40

The above allowable emission limits were based on the following equation:

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:

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

Because efficient material usage is essential to the economic viability of the process, Pregis reuses most of the scrap/trim plastic in the process. The plastic sheet/plank is ground by the grinders; ground plastic is drawn by vacuum (negative pressure) from the grinders to the reclaim extruders and repelletized. The repelletized plastic is stored in silos or gaylord boxes until it is reused again in the process or sold. The grinders are controlled by cyclones and dust collectors to control particulate emissions.

The cyclone and dust collectors shall be in operation at all times that the grinders are in operation in order to comply with the above limits.

(b) 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. This includes the following activities:

- (1) Storage silos for plastic pallets.
- (2) Grinding and Machining.

State Rule Applicability - Welding MIG /TIG and Plasma cutting operation

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

The machining operations and manufacturing activities (cutting torches, soldering equipment, and welding equipment) are not subject to the provisions of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because:

- (a) All welding equipment uses less than 625 pounds of rod or wire per day. [326 IAC 6-3-1(b)(9)]
- (b) Each cutting torch cuts less than 3,400 inches of stock per hour at one (1) inch thickness or less. [326 IAC 6-3-1(b)(10)]

State Rule Applicability - Degreasing Units, Adhesives, Storage Tanks

326 IAC 2-7-1(21) (Insignificant Activities)

Pursuant to 326 IAC 2-7-1(21), for Volatile Organic Compounds (VOC), the exemption limit is less than three (3) pounds per hour or fifteen (15) pounds per day. Miscellaneous hand held equipment usage for degreasing or adhesives containing VOC is less than three (3) pounds per hour each and less than fifteen (15) pounds per day each. Therefore, these emission units are exempt under 326 IAC 8-1-1.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, because the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The organic solvent used in the degreaser is a non-VOC and non-HAP containing citric acid-based cleaning solution. Therefore, 326 IAC 8-3 rules no longer apply to this unit.

326 IAC 8-9 (Volatile Organic Liquid Vessel)

The two (2) 12,000 gallon blowing agent storage tanks are not subject to the requirements of the 326 IAC 8-9, because these vessels are not located in Clark, Floyd, Lake, or Porter County.

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 testing requirements applicable to this source are as follows:

In Order to demonstrate the compliance status with 326 IAC 8-1-6, the Permittee shall conduct a performance test to verify VOC control efficiency, as per condition D.1.1(b), for the thermal oxidizers CE03 and CE-4, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing
Two (2) plank extrusion lines PL-1, PL-3 and foam sheet extrusion Line BG-1	Thermal Oxidizer CE03	Within five (5) years of the date of the last valid compliance demonstration	VOC	Once every five (5) years
Two (2) foam sheet extrusion lines SL-1, SL-2	Thermal Oxidizer CE04	Within five (5) years of the date of the last valid compliance demonstration	VOC	Once every five (5) years

NOTE 1: The last valid stack test occurred on June 24, 2008 for VOC. The source was in compliance at that time.

The compliance determination and monitoring requirements applicable to this source are as follows:

(a) Dust collectors and Cyclone:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Dust collectors and cyclones	Visual emissions	Quarterly Inspection	Normal-Abnormal	Response Steps

(b) The regenerative thermal oxidizers (CE03 and CE04) have applicable compliance monitoring conditions as specified below:

- (1) When operating regenerative thermal oxidizers, identified as CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test, in order for CE03 and CE04 and their respective capture systems to each maintain an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and an overall control efficiency of 95% for the scrap lines.
- (2) The Permittee shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements). The operation of this device can

allow for brief periods of time when temperature is not recorded to allow for a change of the recording media.

- (3) This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.
- (4) The Permittee shall measure the differential pressure of the permanent total enclosure (PTE) capture systems associated with the two (2) plank and one (1) foam sheet extrusion lines, identified as PL-1, PL-3, and BG-1, and the two (2) foam sheet extrusion lines, identified as SL-1 and SL-2, once per day when these facilities are in operation in order for each to maintain an overall control efficiency of 98% for the manufacturing process of the foam sheet and plank lines, and an overall control efficiency of 95% for the scrap lines.
- (5) The differential pressure of the permanent total enclosure (PTE) capture system shall be observed daily when the thermal oxidizers are in operation. When for any two consecutive required once per day pressure readings, the differential pressure is below the normal indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. A reading that is below the indicator level of negative 0.007 inches of water difference between the inside and outside of the PTE enclosure or a level 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.

These monitoring conditions are necessary because the regenerative thermal oxidizers (CE03 and CE04) for the plank and foam sheet extrusion lines (PL-1, PL-3, and BG-1), and the foam sheet extrusion lines (SL-1 and SL-2) must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), 40 CFR 64 (CAM), and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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 November 10, 2011. Additional information was received on February 29, 2012, and March 14, 2012.

Conclusion

The operation of this packaging materials manufacturing plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No.: T099-31133-00028.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Swarna Prabha 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) 234-6543 or toll free at 1-800-451-6027 extension (46543).

- (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

Appendix A: Emission Calculations Summary

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Operating Permit No.: T099-31133-00028
Reviewer: Swarna Prabha
Date: 3/5/2012

Uncontrolled Potential Emissions (tons/year)											
Emissions Generating Activity											
Pollutant	Foam Sheet Extrusion line (BG-1)	Two (2) Plank Foam Extrusion Lines (PL-1, PL-3)	Two (2) Foam Sheet Extrusion lines (SL-1, SL-2)	***Finished Product Storage Warehouse	*Resin Unload, Resin Pellet Handling, RPP Silo Filling, Reclaim	Grinders	Natural Gas Combustion	Natural Gas Combustion (Boiler)	Welding and Thermal cutting	Printing Operation	TOTAL
						JSP, GR8, GR9, GR10, GR1					
PM	0.00	0.00	0.00	0.00	0.50	153.17	0.04	0.04	2.14	0.00	155.90
PM10	0.00	0.00	0.00	0.00	0.50	153.17	0.18	0.17	2.14	0.00	156.16
PM2.5	0.00	0.00	0.00	0.00	0.50	153.17	0.18	0.17	2.14	0.00	156.16
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.03
NOx	0.00	0.00	0.00	0.00	0.00	0.00	2.30	2.19	0.00	0.00	4.49
VOC	828.18	232.62	1,084.54	158.27	0.00	0.00	0.13	0.12	0.00	1.21	2,305.07
CO	0.00	0.00	0.00	0.00	0.00	0.00	1.94	1.84	0.00	0.00	3.77
CO2e	0.00	0.00	0.00	0.00	0.00	0.00	5,425.47		0.00	0.00	5,425.47
total HAPs	negl.	negl.	negl.	negl.	0.00	negl.	0.08		negl.	0.00	0.08
worst case single HAP	negl.	negl.	negl.	negl.	0.00	negl.	(Hexane) 0.085		negl.	0.00	0.085
Total emissions based on rated capacity at 8,760 hours/year.											
Limited/ Controlled Potential Emissions (tons/year)											
Emissions Generating Activity											
Pollutant	Foam Sheet Extrusion line (BG-1)	Two (2) Plank Foam Extrusion Lines (PL-1, PL-3)	Two (2) Foam Sheet Extrusion lines (SL-1, SL-2)	Finished Product Storage Warehouse	*Resin Unload, Resin Pellet Handling, RPP Silo Filling, Reclaim	Grinders	Natural Gas Combustion	Natural Gas Combustion (Boiler)	Welding and Thermal cutting	Printing Operation	TOTAL
						JSP, GR8, GR9, GR10, GR1					
PM	0.00	0.00	0.00	0.00	0.50	1.53	0.04	0.04	2.14	0.00	4.26
PM10	0.00	0.00	0.00	0.00	0.50	1.53	0.18	0.17	2.14	0.00	4.51
PM2.5	0.00	0.00	0.00	0.00	0.50	1.53	0.18	0.17	2.14	0.00	4.51
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.03
NOx	0.00	0.00	0.00	0.00	0.00	0.00	2.30	2.19	0.00	0.00	4.49
VOC	< 247**				0.00	0.00	0.13	0.12	0.00	1.21	1.46
CO	0.00	0.00	0.00	0.00	0.00	0.00	1.94	1.84	0.00	0.00	3.77
CO2e	0.00	0.00	0.00	0.00	0.00	0.00	5,425.47		0.00	0.00	5,425.47
total HAPs	negl.	negl.	negl.	negl.	0.00		0.08		negl.	0.00	0.08
worst case single HAP	negl.	negl.	negl.	negl.	0.00		(Hexane) 0.08		negl.	0.00	(Hexane) 0.08
Total emissions based on rated capacity at 8,760 hours/year, after control and any applicable emission limits.											

* Estimated emissions from storage silos, resin plastic pellets etc.

** VOC emissions from BG-1, PL-1, PL-3, SL-1, SL-2 are limited to 247.0 tons/yr in order to accommodate for the potential VOC emissions from ink printers and flexographic printing stations and render the requirements of 326 IAC 2-2 not applicable.

*** Emissions are from amount of emissions released from Warehouse SL-1, SL-2 and BG-1

Appendix A: Emission Calculations

Plymouth Mass Balance: H-cell (Laminated Foam sheet extrusion line) - BG-1

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Operating Permit No.: T099-31133-00028
Reviewer: Swarna Prabha
Date: 3/5/2012

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Plymouth Mass Balance: H-cell (Laminated Foam Plank) - BG-1

1	Parameter	Symbol/Formula		
2	Total solids processed, lb/yr	m1	16,907,326	= 0.8773 * 2200 lb/hr * 8760 hrs
3	VOC used in foaming process, lb/yr	m2	2,362,747	= 0.1226 * 2200 lb/hr * 8760 hrs
4	VOC used for start-ups, lb/yr	E1	0	
5	Product SGO, lb/yr	m3	16,351,695	10% scrap rate
6	Converted product SGO (H-cell), lb/yr	m4	14,716,526	
7	Solids content of start-up scrap, lb/yr	m5	0	
8	Primary Extrusion			
9	VOC weight fraction in extruded foam, %	w1	6.900%	
10	Solids content of product SGO, lb/yr	m6 = (1 - w1) x m3	15,223,428	
11	Solids content of extrusion scrap, lb/yr	m7 = m1 - m5 - m6	1,683,898	
12	Amount of VOC in extruded foam, lb/yr	m8 = (w1 / (1 - w1)) x (m1 - m5)	1,253,067	
13	Amount of VOC available for control, lb/yr	m9 = m2 - m8	1,109,680	
14	Collection efficiency, %	ce1	100%	
15	WIP/Aging			
16	VOC weight fraction in aged foam, %	w2	4.800%	
17	Amount of VOC available for control, lb/yr	m10 = (w1 / (1 - w1) - w2 / (1 - w2)) x m6	360,699	
18	Collection efficiency, %	ce2	100%	
19	Laminating/Converting			
20	VOC weight fraction in laminated product, %	w3	4.800%	
21	Amount of VOC available for control, lb/yr	m11 = ((w2 / (1 - w2)) - (w3 / (1 - w3))) x m6	0	
22	Collection efficiency, %	ce3	100%	
23	Solids content of converted product SGO, lb/yr	m12 = (1 - w3) x m4	14,010,133	
24	Solids content of converting scrap, lb/yr	m13 = m6 - m12	1,213,295	
25	Reclaim Process			
26	Amount of VOC in extrusion scrap, lb/yr	m14 = (w1 / (1 - w1)) x m7	124,800	
27	Amount of VOC in converting scrap, lb/yr	m15 = (w3 / (1 - w3)) x m13	61,175	
28	Amount of VOC available for control, lb/yr	m16 = m14 + m15	185,975	
29	Collection efficiency, %	ce4	98%	
30	Emissions			
31	Total amount of VOC available for control, lb/yr	m17 = m9 + m10 + m11 + m16	1,656,354	Uncontrolled VOC emissions
32	Composite collection efficiency, %	ce = (m9 x ce1 + m10 x ce2 + m11 x ce3 + m16 x ce4) / m17	99.8%	
33	Amount of VOC not collected, lb/yr	E2 = m17 x (1 - ce)	3,719	
34	Destruction efficiency, %	de	99.4%	
35	Amount of VOC destroyed, lb/yr	m18 = (m17 - E2) x de	1,642,719	
36	Stack emissions, lb/yr	E3 = m17 - E2 - m18	9,916	
37	VOC wt fr in finished goods @ 14 days, %	w4	3.200%	
38	Amount of VOC released in the warehouse, lb/yr	E4 = (w3 / (1 - w3) - w4 / (1 - w4)) x m12	243,248	
39	Total Potential Emissions, lb/yr	E = E1 + E2 + E3 + E4	256,884	
40	Total Potential Emissions, tons/yr	E = (E1 + E2 + E3 + E4)/2000	128.44	

Appendix A: Emission Calculations

Plymouth Mass Balance - Extruded Foam Plank - PL-1 and PL-3

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Operating Permit No.: T099-31133-00028
Reviewer: Swarna Prabha
Date: 3/5/2012

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1	Parameter	Symbol/Formula		
2	Total solids processed, lb/yr	m1	9,926,175	= 0.925 * 1225 lb/hr * 8760 hrs
3	VOC used in foaming process, lb/yr	m2	804,825	= 0.075 * 1225 lb/hr * 8760 hrs
4	VOC used for start-ups, lb/yr	E1	0	
5	Product SGO, lb/yr	m3	6,893,177	35% scrap rate
6	Solids content of start-up scrap, lb/yr	m5	0	
7	Primary Extrusion			
8	VOC weight fraction in extruded foam, %	w1	6.400%	
9	Solids content of product SGO, lb/yr	m6 = (1 - w1) x m3	6,452,014	
10	Solids content of extrusion scrap, lb/yr	m7 = m1 - m5 - m6	3,474,161	
11	Amount of VOC in extruded foam, lb/yr	m8 = (w1 / (1 - w1)) x (m1 - m5)	678,713	
12	Amount of VOC available for control, lb/yr	m9 = m2 - m8	126,112	
13	Collection efficiency, %	ce1	100%	
14	WIP/Aging			
15	VOC weight fraction in aged foam, %	w2	5.000%	
16	Amount of VOC available for control, lb/yr	m10 = (w1 / (1 - w1) - w2 / (1 - w2)) x m6	101,584	
17	Collection efficiency, %	ce2	100%	
18	Reclaim Process			
19	Amount of VOC in extrusion scrap, lb/yr	m14 = (w1 / (1 - w1)) x m7	237,549	
20	Amount of VOC available for control, lb/yr	m16 = m14	237,549	
21	Collection efficiency, %	ce4	98%	
22	Emissions			
23	Total amount of VOC available for control, lb/yr	m17 = m9 + m10 + m16	465,245	Uncontrolled VOC emissions
24	Composite collection efficiency, %	ce = (m9 x ce1 + m10 x ce2 + m16 x ce4) / m17	99.0%	
25	Amount of VOC not collected, lb/yr	E2 = m17 x (1 - ce)	4,751	
26	Destruction efficiency, %	de	98.2%	
27	Amount of VOC destroyed, lb/yr	m18 = (m17 - E2) x de	452,205	
28	Stack emissions, lb/yr	E3 = m17 - E2 - m18	8,289	
29	Total Potential Emissions, lb/yr	E = E1 + E2 + E3	13,040	
30	Total Potential Emissions, tons/yr	E = (E1 + E2 + E3)/2000	6.52	

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Operating Permit No.: T099-31133-00028
Reviewer:
Date:

Mass Balance Model for the Plymouth Facility

The emissions calculations are performed using a mass balance approach. The model is set up as a spreadsheet with four worksheets. Three of these worksheets are set up to do mass balance calculations for each product category (BG-1, Sheet, and Plank), and the worksheet contains retention values for the various foams within each product category. Data for other products can be added or the products can be segregated into families without affecting the workings of the mass balance models. Production data is used to calculate weighted average retention values for each product category, and these values are then imported into the various mass balance models.

In addition to the retention values, other inputs to the mass balance model are total solids processed, amount of blowing agent used, finished goods produced, collection efficiencies at various stages of the process, and destruction efficiency.

The governing equations for models for the various product categories are given in the attachment, along with sample calculations. Note that the model for BG-1 is the most involved as its manufacturing process has more steps than the other product categories, and that the models for sheet foam and plank derive from the one for the H-Cell (BG-1 process).

Total site emissions is the sum of the emissions from the sheet, plank, and BG-1 processes.

Appendix A: Emission Calculations
Plymouth Mass Balance: Foam Sheet - SL-1 and SL-2

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Operating Permit No.: T099-31133-00028
Reviewer: Swarna Prabha
Date: 3/5/2012

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1	Parameter	Symbol/Formula		
2	Total solids processed, lb/yr	m1	8,477,490	= 0.79 * 1225 lb/hr * 8760 hrs
3	VOC used in foaming process, lb/yr	m2	2,253,510	= 0.21 * 1225 lb/hr * 8760 hrs
4	VOC used for start-ups, lb/yr	E1	0	
5	Product SGO, lb/yr	m3	7,036,097	18% scrap rate
6	Solids content of start-up scrap, lb/yr	m5	0	
7	Primary Extrusion			
8	VOC weight fraction in extruded foam, %	w1	1.20%	
9	Solids content of product SGO, lb/yr	m6 = (1 - w1) x m3	6,951,664	
10	Solids content of extrusion scrap, lb/yr	m7 = m1 - m5 - m6	1,525,826	
11	Amount of VOC in extruded foam, lb/yr	m8 = (w1 / (1 - w1)) x (m1 - m5)	102,965	
12	Amount of VOC available for control, lb/yr	m9 = m2 - m8	2,150,545	
13	Collection efficiency, %	ce1	100%	
14	Reclaim Process			
15	Amount of VOC in extrusion scrap, lb/yr	m14 = (w1 / (1 - w1)) x m7	18,532	
16	Amount of VOC available for control, lb/yr	m16 = m14	18,532	
17	Collection efficiency, %	ce4	98%	
18	Emissions			
19	Total amount of VOC available for control, lb/yr	m17 = m9 + m16	2,169,077	Uncontrolled VOC emissions
20	Composite collection efficiency, %	ce = (m9 x ce1 + m16 x ce4) / m17	99.98%	
21	Amount of VOC not collected, lb/yr	E2 = m17 x (1 - ce)	371	
22	Destruction efficiency, %	de	98.2%	
23	Amount of VOC destroyed, lb/yr	m18 = (m17 - E2) x de	2,129,669	
24	Stack emissions, lb/yr	E3 = m17 - E2 - m18	39,037	
25	VOC wt fr in finished goods @ 14 days, %	w4	0.16%	
26	Amount of VOC released in the warehouse, lb/yr	E4 = (w1 / (1 - w1) - w4 / (1 - w4)) x m6	73,293	
27	Total Potential Emissions, lbs/yr	E = E1 + E2 + E3 + E4	112,700	
28	Total Potential Emissions, tons/yr	E = (E1 + E2 + E3 + E4)/2000	56.35	

Solid % = 79% VOC = 21%

**Emission Calculations
Particulate Matter - Fiberglass Cutting and Trimming**

**Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Operation Permit No.: T099-31133-00028
Reviewer: Swarna Prabha
Date: March 5, 2012**

Unit ID/Control Device	Maximum Process Throughput Rate (lb/hr)	326 IAC 6-3-2 Allowable Emission Rate (lb/hr)	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM PTE before Controls (lb/hr)	PM PTE before Controls (tons/yr)	PM PTE after Controls (lb/hr)	PM PTE after Controls (tons/yr)
Grinder JSP	450	1.509	99.00%	0.001	12,800	10.97	48.05	0.110	0.481
Grinder GR-9	600	1.830	99.00%	0.001	12,800	10.97	48.05	0.110	0.481
Grinder GR -8	2,000	4.100	99.00%	0.001	12,800	10.97	48.05	0.110	0.481
Grinder GR-1	450	1.509	99.00%	0.001	1,200	1.03	4.51	0.010	0.045
Grinder GR-10	900	2.401	99.00%	0.001	1,200	1.03	4.51	0.010	0.045
Total PTE						34.97	153.17	0.350	1.53

There are no emission factors for PM10 and PM2.5 in AP42, PM = PM10 = PM2.5

Methodology

326 IAC 6-3-2 Allowable Emission Rate for Processes <30 tons/hr = 4.1 x Process Weight (tons/hr) ^ 0.67

PM PTE in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)

PM PTE in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

PM PTE in lbs/hr (before controls) = After Control Emission Rate (lbs/hr)/(1-control efficiency)

PM PTE in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Dust captured from on the plank lines is sent off-site for disposal. Dust captured from grinding on the foam sheet extrusion lines is reclaimed and put back into the system.

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

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Permit No.: T099-31133-00028
Reviewer: Swarna Prabha
Date: 3/5/2012

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr	
5.26	Furnaces	46.1	
5.00	Boiler	43.8	Total (MMBtu/hr)
Total		89.9	

Nine (9) natural gas-fired furnaces each one rated at 0.40 MMBtu per hour	3.60
Two (2) natural gas-fired furnaces each one rated at 0.58 MMBtu per hour	1.16
Five (5) natural gas-fired furnaces each one rated at 0.1 MMBtu per hour	0.50
Total	5.26
One (1) natural gas-fired boiler rated at 5.0 MMBtu per hour	5.00

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	Direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr (Furnaces)	0.04	0.18	0.18	0.01	2.30	0.13	1.94
Potential Emission in tons/yr (Boiler)	0.04	0.17	0.17	0.01	2.19	0.12	1.84

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

*Direct PM2.5 is filterable and condensable 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

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

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

(SUPPLEMENT D 3/98)

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

See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only - plant 2
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Permit No.: T099-13332-00028
Reviewer: Swarna Prabha
Date: 3/5/2012

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	9.44E-05	5.393E-05	3.37E-03	8.09E-02	1.53E-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	2.25E-05	4.94E-05	6.29E-05	1.71E-05	9.44E-05

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

Greenhouse Gas Emissions

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	5392.656	0.103	0.099
Summed Potential Emissions in tons/yr	5,392.86		
CO2e Total in tons/yr	5,425.47		

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

Appendix A: Emissions Calculations

Welding and Thermal Cutting

Company Name: Pregis Innovative Packaging, Inc.
 Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
 Permit No.: T099-31133-00028
 Reviewer: Swarna Prabha
 Date: 3/5/2012

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	4	1		0.0241	0.000034	N/A	0.00001	0.096	0.000	0.000	0.00004
Tungsten Inert Gas (TIG)(carbon steel)	1	0.1		0.0055	0.0005	N/A		0.001	0.000	0.000	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)			
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr
Oxyacetylene	1	8	5	0.1622	0.0005	0.0001	0.0003	0.389	0.000	0.000	0.000
Plasma**	1	8	10	0.0039				0.002	0.000	0.000	0.000
EMISSION TOTALS											
Potential Emissions lbs/hr								0.489	0.000	0.000	0.000
Potential Emissions lbs/day								11.73	0.009	0.00	0.00
Potential Emissions tons/year								2.14	0.002	0.00	0.00

METHODOLOGY

Calculations are conservative since these are maintenance welders and are seldom used.

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations
Printing Operation**

**Company Name: Pregis Innovative Packaging, Inc.
Address City IN Zip: 1411 Pidco Drive, Plymouth, Indiana 46563
Permit No.: T099-31133-00028
Reviewer: Swarna Prabha
Date: 3/5/2012**

Emission Units	Worst case Ink solvents	Manufacturer	Density (lbs/gal)	VOC Content (Wt %)	Maximum usage (gal/yr)	PTE VOC (tons/yr)
Multiple Production lines	FSOR-11001 STD Water Based Ink	Interactive Inks and Coatings	8.68	6.37	660	0.182
Bubble Line	SCP901A black Solvent Based Ink	Mathews International	6.76	0.0	22.5	0.000
Mailing Lines	KAG58113F Water - based Flexo Ink	Sun Chemical	9.55	2.62	756	0.095
various cleaning operations	NP Cleaning Solvent	Videojet Technologies	6.92	79	342	0.935
Total						1.212

NOTES:

Worst case ink/ solvent product is based upon the individual product used in each location with the highest VOC content
Density (lbs/gal) = from MSDS
VOC content (wt%) from MSDS

Methodology:

Max. Usage (gal/yr) = Annual actual Ink/solvent usage (gal/yr) * 1.5 (safety factor)

PTE VOC (tons/yr) = Max. Usage (gal/gr) * Density (lbs/gal) * VOC content (wt%) * (1 ton/ 2,000 lbs)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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(317) 232-8603
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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Steve Gorski
Pregis Innovative Packaging
1411 Pidco Dr
Plymouth, IN 46563

DATE: June 26, 2012

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

SUBJECT: Final Decision
Title V - Renewal
099 - 31133 - 00028

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:
Dennis Hughes, Dir - Plant Ops
Joseph VanCamp Cornerstone Environmental
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Toll Free (800) 451-6027
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June 26, 2012

TO: Plymouth Public Library

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

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

Applicant Name: Pregis Innovative Packaging
Permit Number: 099 - 31133 - 00028

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	LPOGOST 6/26/2012 Pregis Inovative Packaging, Inc. 099 - 31133 - 00028 /final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
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6		Mr. Joseph VanCamp Cornerstone Environmental 312 E Diamond St. Kendallville IN 46755 (Consultant)										
7		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)										
8		Ms. Julie Grzesiak 1924 S. 1050 W. Russiaville IN 46979 (Affected Party)										
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