



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: July 26, 2012

RE: Banjo Corporation / 107-31231-00066

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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

Banjo Corporation
150 Banjo Drive
Crawfordsville, Indiana 47933

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

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

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

Operation Permit No.: M107-31231-00066	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 26, 2012 Expiration Date: July 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary plastic injection molding and plastic machining operation plant.

Source Address:	150 Banjo Drive, Crawfordsville, Indiana 47933
General Source Phone Number:	765-362-7367
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) closed injection molding operation, consisting of thirty-one (31) plastic injection molding machines, constructed between 1989 and 2008, with a combined maximum throughput capacity of 540 pounds per hour of raw materials, using no controls, exhausting inside the building. The raw material contains no HAPs. The plastic beads used in this molding process are heated using electric heaters prior to injection. A mold release agent containing VOCs is applied manually from aerosol cans, and is used in this operation on an as-needed basis only.
- (b) One (1) coupling operation to machine plastic parts consisting of two (2) coupling machines, constructed in 1996, with a combined maximum capacity of 360 pounds per hour, using a bag filter system for particulate control, and exhausting inside the building.
- (c) One (1) grinding operation to grind scrap parts for reuse, consisting of two (2) grinders, constructed in 1989, with a combined throughput of 54 pounds per hour, controlled by an integral cyclone, for product recovery separation purposes, and a baghouse for particulate control, exhausting inside the building. The cyclone has been determined to be integral to the process of this operation.
- (d) One (1) sandblasting operation, consisting of one (1) sandblasting machine, constructed in 1989, using a maximum amount of media of 150 pounds per hour, using a cartridge filter for particulate control, exhausting inside the building.

Note: This unit is used only on an as-needed basis to blast metal parts used in assembly of the plastic parts produced at the source to form the final product.
- (e) One (1) metal parts cleaning operation, constructed in 1989, with a maximum material usage of 0.55 pounds per hour, using a solution containing VOCs, using no controls.

Note: This operation is used only on an as-needed basis to clean metal parts used in the

assembly of the plastic parts produced at the source or the final product.

- (f) Seventeen (17) natural gas-fired space heater units to heat the facility, constructed in 1989, with a combined maximum heat input capacity of 3.002 MMBtu/hr, and exhausting inside the building.
- (g) Fugitive emissions from paved roads serving the facility.

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M107-31231-00066, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.6 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.7 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M107-31231-00066 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

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

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

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

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

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

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

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

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

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

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

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

B.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) closed injection molding operation, consisting of thirty-one (31) plastic injection molding machines, constructed between 1989 and 2008, with a combined maximum throughput capacity of 540 pounds per hour of raw materials, using no controls, exhausting inside the building. The raw material contains no HAPs. The plastic beads used in this molding process are heated using electric heaters prior to injection. A mold release agent containing VOCs is applied manually from aerosol cans, and is used in this operation on an as-needed basis only.
- (b) One (1) coupling operation, to machine plastic parts, consisting of two (2) coupling machines, constructed in 1996, with a combined maximum capacity of 360 pounds per hour, using a bag filter system for particulate control, and exhausting inside the building.
- (c) One (1) grinding operation to grind scrap parts for reuse, consisting of two (2) grinders, constructed in 1989, with a combined throughput of 54 pounds per hour, controlled by an integral cyclone, for product recovery separation purposes, and a baghouse for particulate control, exhausting inside the building. The cyclone has been determined to be integral to the process of this operation.
- (d) One (1) sandblasting operation, consisting of one (1) sandblasting machine, constructed in 1989, each using a maximum amount of media of 150 pounds per hour, using a cartridge filter for particulate control, exhausting inside the building.

Note: This unit is used only on an as-needed basis to blast metal parts used in assembly of the plastic parts produced at the source to form the final product.

- (e) One (1) metal parts cleaning operation, constructed in 1989, with a maximum material usage of 0.55 pounds per hour, using a solution containing VOCs, using no controls.

Note: This operation is used only on an as-needed basis to clean metal parts used in the assembly of the plastic parts produced at the source to for the final product.

- (f) Seventeen (17) natural gas-fired space heater units to heat the facility, constructed in 1989, with a combined maximum heat input capacity of 3.002 MMBtu/hr, and exhausting inside the building.
- (g) Fugitive emissions from paved roads serving the facility.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each plastic injection molding machine shall not exceed a total of 1.70 pounds per hour when operating at a process weight rate of 0.27 tons per hour (540 pounds per hour divided by 2,000 pounds per ton).
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each coupling machine shall not exceed a total of 1.30 pounds per hour when operating at a process weight rate of

0.18 tons per hour (360 pounds per hour divided by 2,000 pounds per ton).

- (c) Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from each grinding machine shall not exceed a total of 0.551 pounds per hour when operating at a process weight rate of 0.027 tons per hour (54 pounds per hour).
- (d) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the sandblasting machine shall not exceed a total of 0.72 pounds per hour when operating at a process weight rate of 0.075 tons per hour (150 pounds per hour divided by 2,000 pounds per ton).

The pound per hour limitations were calculated with 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:

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the plastic injection molding operation, the coupling operation, the grinding operation, and the sandblasting operation and their control devices.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the Permittee shall comply with the following:

- (a) The bag filter system shall operate at all times that the plastic injection molding operation is operating.
- (b) The bag filter system shall operate at all times that the coupling operation is operating.
- (c) The cyclone and baghouse shall both operate at all times that the grinding operation is operating.
- (d) The cartridge filter system shall operate at all times that the sandblasting operation is operating.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) One (1) metal parts cleaning operation, constructed in 1989, with a maximum material usage of 0.55 pounds per hour, using a solution containing VOCs, using no controls.

Note: This operation is used only on an as-needed basis to clean metal parts used in the assembly of the plastic parts produced at the source to for, the final product.

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

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

D.2.1 Volatile Organic Compounds (VOC) for Cold Cleaner Operation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, the Permittee, as owner and/or operator of a cold cleaning facility, 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 operating 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.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Banjo Corporation
Address:	150 Banjo Drive
City:	Crawfordsville, Indiana 47933
Phone #:	765-362-7367
MSOP #:	M107-31231-00066

I hereby certify that Banjo Corporation is:

still in operation.

no longer in operation.

I hereby certify that Banjo Corporation is:

in compliance with the requirements of MSOP M107-31231-00066.

not in compliance with the requirements of MSOP M107-31231-00066.

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

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

Noncompliance:

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Mail to: Permit Administration and Support Section

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

Banjo Corporation
150 Banjo Drive
Crawfordsville, Indiana 47933

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Banjo Corporation 150 Banjo Drive, Crawfordsville, Indiana 47933, completed construction of the plastic injection molding and plastic machining operation plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on December 7, 2011 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M107-31231-00066, Plant ID No. 107-00066 issued on _____.
5. Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

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

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

Source Description and Location

Source Name: Banjo Corporation
Source Location: 150 Banjo Drive, Crawfordsville, Indiana 47933
County: Montgomery
SIC Code: 3089 (Plastic Products, Not Elsewhere Classified)
Operation Permit No.: 107-31231-00066
Permit Reviewer: Jack Harmon

On December 7, 2011, the Office of Air Quality (OAQ) received an application from Banjo Corporation related to the construction and operation of a new stationary plastic injection molding and plastic machining operation plant. Additional information was received January 10, May 29, and June 14, 2012.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Montgomery County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, 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.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

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

- (b) **PM_{2.5}**
 Montgomery 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
Montgomery 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

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Banjo Corporation on December 7, 2011, relating to a request for an operating permit at its facility. The source has been constructed and operating since at least 1989. The source operates a plastic injection molding and machining operation that has the potential to emit criteria pollutants. This proposed approval is intended to satisfy the requirements of the permit rules.

There are currently no permitted units at this source.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) closed injection molding operation, consisting of thirty-one (31) plastic injection molding machines, constructed between 1989 and 2008, with a combined maximum throughput capacity of 540 pounds per hour of raw materials, using no controls, exhausting inside the building. The raw material contains no HAPs. The plastic beads used in this molding process are heated using electric heaters prior to injection. A mold release agent containing VOCs is applied manually from aerosol cans, and is used in this operation on an as-needed basis only.
- (b) One (1) coupling operation to machine plastic parts consisting of two (2) coupling machines, constructed in 1996, with a combined maximum capacity of 360 pounds per hour, using a bag filter system for particulate control, and exhausting inside the building.
- (c) One (1) grinding operation to grind scrap parts for reuse, consisting of two (2) grinders, constructed in 1989, with a combined throughput of 54 pounds per hour, controlled by an integral cyclone, for product recovery separation purposes, and a baghouse for particulate control, exhausting inside the building. The cyclone has been determined to be integral to the process of this operation.
- (d) One (1) sandblasting operation, consisting of one (1) sandblasting machine, constructed in 1989, using a maximum amount of media of 150 pounds per hour, using a cartridge filter for particulate control, exhausting inside the building.
- Note: This unit is used only on an as-needed basis to blast metal parts used in assembly of the plastic parts produced at the source to form the final product.
- (e) One (1) metal parts cleaning operation, constructed in 1989, with a maximum material usage of 0.55 pounds per hour, using a solution containing VOCs, using no controls.

Note: This operation is used only on an as-needed basis to clean metal parts used in the assembly of the plastic parts produced at the source for the final product.

- (f) Seventeen (17) natural gas-fired space heater units to heat the facility, constructed in 1989, with a combined maximum heat input capacity of 3.002 MMBtu/hr, and exhausting inside the building.
- (g) Fugitive emissions from paved roads serving the facility.

“Integral Part of the Process” Determination

- (a) The applicant has submitted the following information to justify why the cyclone and the baghouse should each be considered an integral part of the grinding operation:

- (1) The cyclone and the baghouse are connected in series to each other, so that material passes from the grinders to the cyclone, and material passing through the cyclone enters the baghouse control. The sole purpose of the cyclone is to recover plastic chips to be reused in the molding process. The baghouse is used to collect dust from the grinders.

IDEM, OAQ has evaluated the information submitted and agrees that the cyclone should be considered an integral part of the grinding operation. This determination is based on the fact that the cyclone exists for the purpose of extracting large materials from the system, and dropping them into a recycle hopper to be reused at the beginning of the molding process. Therefore, its function is not pollution control, but, rather, a part of the manufacturing process, and this process would exist, even if there were no air pollution control regulations. Therefore, the permitting level will be determined using the potential to emit after the cyclone. Operating conditions in the proposed permit will specify that this cyclone shall operate at all times when the grinding operation is in operation.

IDEM, OAQ has evaluated the information submitted and has determined that the baghouse should not be considered an integral part of the grinding operation. This determination is based on the fact that its function is to collect dust from the grinding operation that would otherwise escape as fugitive emissions of criteria pollutants, and, therefore, is functioning as an air pollution control device. Therefore, the permitting level will be determined using the potential to emit before the baghouse.

- (b) The applicant has submitted the following information to justify why the cartridge bag filter system should be considered an integral part of the sandblasting operation:

- (1) The bag filter system is used to collect dust from the sandblasting operation.

IDEM, OAQ has evaluated the information submitted and has determined that the bag filter system should not be considered an integral part of the sandblasting operation. This determination is based on the fact that its primary function is to collect dust from the sandblasting operation that would otherwise escape as fugitive emissions of criteria pollutants, and, therefore, is functioning as an air pollution control device. Therefore, the permitting level will be determined using the potential to emit before the bag filter system.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year) ⁽²⁾
PM	34.69
PM10 ⁽¹⁾	37.83
PM2.5	22.40
SO ₂	0.01
NO _x	1.31
VOC	0.27
CO	1.10
GHGs as CO₂e	1587.45

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
- (2) The PTE for PM, PM10, and PM2.5 for the grinding operation shown above are based on emissions using the cyclone as integral to its process, and is used in determining the permit level for this source. A Prevention of Significant Deterioration (PSD) evaluation was based on potential emissions without the use of this control, and this evaluation determined that the source was minor source under 326 IAC 2-2 (PSD). Appendix A of this Technical Support Document contains details of this evaluation.

HAPs	Potential To Emit (tons/year)
Hexane	0.0237
TOTAL HAPs	0.0237

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

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Molding Operations (31 Units)	0.15	0.15	0.15	0.00	0.00	0.18	0.00	0.00	0.00	0.00
Coupling Operation (2 Units)	4.64	17.00	9.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grinding Operation (2 Units)***	12.01	12.01	12.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sandblasting Operation (1Unit)	17.74	8.54	0.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Metal Parts Cleaning (1 Unit)	0.00	0.00	0.00	0.00	0.00	0.017	0.00	0.00	0.00	0.00
Natural Gas Combustion (17 Heating Units)	0.025	0.099	0.099	0.079	1.31	0.072	1.10	1587.45	0.024	0.024 (Hexane)
Fugitive Emissions - Paved Roads	0.12	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	34.69	37.83	22.40	0.01	1.31	0.27	1.10	1587.45	0.024	0.024 (Hexane)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. ***The cyclone control device for the grinding operation is considered integral to the process (see "Integral Part of the Process" Determination section above). Therefore, these emissions are based on the potential to emit, using the effectiveness of this control device.										

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs)

- for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T, are not included in the permit, since the source does not use solvents that are halogenated. Therefore, the requirements of 40 CFR 63, Subpart T do not apply.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Group I Polymers and Resins, 40 CFR 63, Subpart U, are not included in the permit, since the source does not use Group I polymers and resins, as defined in 63.480. Therefore, the requirements of 40 CFR 63, Subpart U do not apply.
 - (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories - Generic MACT Standards, 40 CFR 63, Subpart YY, are not included in the permit, since the source is not a producer of chemicals defined in Table 63-1100(a). Therefore, the requirements of 40 CFR 63, Subpart YY do not apply.
 - (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Group IV Polymers and Resins, 40 CFR 63, Subpart JJJ, are not included in the permit, since the source is not a major source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart JJJ do not apply.
 - (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63, Subpart FFFF, are not included in the permit, because the source does not fit the definition of a manufacturer of chemicals as defined in 63.2550, and is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart FFFF do not apply.
 - (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts, 40 CFR 63, Subpart PPPP, are not included in the permit, since the source does not perform surface coating and is not a major source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart PPPP do not apply.
 - (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Composites Production, 40 CFR 63, Subpart WWWW, are not included in the permit, since the source does not produce reinforced composites and is not a major source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart WWWW do not apply.
 - (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Polyvinyl Chloride and Copolymers Production - Area Sources, 40 CFR 63, Subpart DDDDDD, are not included in the permit, because the source does not produce polyvinyl chloride and copolymers. Therefore, the requirements of 40 CFR 63, Subpart DDDDDD do not apply.
 - (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Preparations Industry, 40 CFR 63, Subpart BBBB, are not included in the permit, because the source is not a chemical preparations plant, as defined in 63.11588. Therefore, the requirements of 40 CFR 63, Subpart BBBB do not apply.
 - (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T, are not included in the permit, since the source does not use solvents that are halogenated. Therefore, the requirements of 40 CFR 63, Subpart T do not apply.
 - (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Polyvinyl Chloride and Copolymers Production, 40 CFR 63, Subpart HHHHHH, are not included in the permit, since the source does not produce polyvinyl chloride and copolymers, as defined in 63.12005, and is not a major source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart HHHHHH do not apply.

- (n) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit, before control, of all attainment regulated pollutants are less than 100 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO_{2e} per year, and this source is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-3 (Emission Offset)
This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the source is located in an attainment county for all criteria pollutants. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement

on which the source is located, in a manner that would violate 326 IAC 6-4.

- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the fugitive dust sources do not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, the requirements of 326 IAC 6-5 do not apply.

Plastic Injection Molding Operation

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The plastic injection molding operation is subject to the requirements of 326 IAC 6-3-2 because it is a manufacturing operation that has the potential to emit particulate. There are thirty-one plastic injection molding machines in this operation, but, because each machine manufactures product, each is considered its own manufacturing operation, and, therefore, each is subject to the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each plastic injection molding machine shall not exceed a total of 1.70 pounds per hour when operating at a process weight rate of 0.27 tons per hour (540 pounds per hour divided by 2,000 pounds per ton). The pound per hour limitation was calculated with 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:

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

Based on calculations, the source can comply with this limit without the use of control devices because the uncontrolled potential to emit particulate is less than the limit under 326 IAC 6-3-2.

Coupling Operation

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The coupling operation is subject to the requirements of 326 IAC 6-3-2 because it is a manufacturing operation that has the potential to emit particulate. There are two coupling machines in the operation, but, because each machine manufactures product and has the potential to emit particulate, each is considered its own manufacturing operation, and, therefore, each is subject to the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each coupling machine shall not exceed a total of 1.30 pounds per hour when operating at a process weight rate of 0.18 tons per hour (360 pounds per hour divided by 2,000 pounds per ton). The pound per hour limitation was calculated with 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:

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

The baghouse shall be in operation at all times the coupling operation is in operation, in order to comply with this limit. Based on the calculations, the source can comply with this limit with the use of the control device.

Grinding Operation

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The grinding operation is subject to the requirements of 326 IAC 6-3-2 because it is a manufacturing operation that has the potential to emit particulate. There are two grinding machines in the operation, but, because each machine manufactures product and has the

potential to emit particulate, each is considered its own manufacturing operation, and, therefore, each is subject to the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the grinding operation shall not exceed a total of 0.551 pounds per hour when operating at a process weight rate of 0.027 tons per hour (54 pounds per hour). This rule sets the emission limit of 0.551 pounds per hour when the process weight rate is less than 100 pounds per hour. The grinding operation has a process weight rate of 54 pounds per hour; therefore, the particulate emission limit of 0.551 pounds per hour is set by rule, rather than the use of the equation.

The cyclone and the baghouse shall both be in operation at all times the grinding operation is in operation, in order to comply with this limit. Based on the calculations, the source can comply with this limit with the use of the control devices.

Sandblasting Operation

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The sandblasting operation is subject to the requirements of 326 IAC 6-3-2 because it is a manufacturing operation that has the potential to emit particulate. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the sandblasting operation shall not exceed a total of 0.72 pounds per hour when operating at a process weight rate of 0.075 tons per hour (150 pounds per hour divided by 2,000 pounds per ton). The pound per hour limitation was calculated with 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:

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

The bag filter system shall be in operation at all times the sandblasting operation is in operation, in order to comply with this limit. Based on the calculations, the source can comply with this limit with the use of the control device.

- (m) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from the entire source is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (n) 326 IAC 8-3-2 (VOC Rules: Cold Cleaner Operation)
The metal parts cleaning operation is subject to the requirements of 326 IAC 8-3-2 because the operation meets the definition of a cold cleaner operation that uses materials containing VOCs. Pursuant to 326 IAC 8-3-2, the Permittee, as owner and/or operator of a cold cleaning facility, shall:
- (1) equip the cleaner with a cover;
 - (2) equip the cleaner with a facility for draining cleaned parts;
 - (3) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) provide a permanent, conspicuous label summarizing the operating requirements;
 - (6) 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.
- (o) There are no other 326 IAC 8 Rules that are applicable to the source.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows. These are necessary because, in order for the source to be able to comply with the emissions limits required by 326 IAC 6-3-2, the control devices must operate, as follows:
- (1) In order to demonstrate the compliance status of the emissions limits required by 326 IAC 6-3-2, the bag filter system shall operate at all times that the coupling operation is operating.
 - (2) In order to demonstrate the compliance status of the emissions limits required by 326 IAC 6-3-2, the cyclone and baghouse shall both operate at all times that the grinding operation is operating.
 - (3) In order to demonstrate the compliance status of the emissions limits required by 326 IAC 6-3-2, the cartridge filter system shall operate at all times that the sandblasting operation is operating.
- (b) There are no testing requirements applicable to this source. The closed injection molding system has minimal process emissions due to its design, but conservative emission factors were used anyway. Since these emission factors were conservative, and the expected amount of emissions is very low, the source will not be required to test this process.

For the coupling operation, there are no AP-42 or Webfire emission factors available for this operation, and actual data from material collection for one year at this source was used. Particle-size distribution figures were from AP-42. The source will not be required to test based on the fact that these potential emissions represent a more conservative estimate than traditional methods, and the potential to emit is very small.

Other emission factors were either from AP-42, or were directly from the manufacturer of the equipment used in the particular process at this source. OAQ, Compliance Data Section agrees with this testing decision.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 7, 2011. Additional information was received January 10, May 29, and June 14, 2012.

The operation of this source shall be subject to the conditions of the attached proposed New Source Construction and New Source Review and MSOP No. 107-31231-00066. The staff recommends to the Commissioner that this New Source Construction and New Source Review and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jack Harmon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 317-233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emission Calculations
Uncontrolled Emissions Summary**

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
Plt ID: 107-00066
Permit Reviewer: Jack Harmon
Date: 2012

Emission unit	Uncontrolled Potential to Emit (tons/yr)										
	PM	PM10	PM2.5	SO2	Nox	VOC	CO	CO2e	Total HAPs	Worst HAP	(HAP)
Molding Operations (31 Units)	0.15	0.15	0.15	0.00	0.00	0.18	0.00	0.00	0.00	0.00	n/a
Coupling Operations (2 Units)	4.64	17.00	9.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	n/a
Grinding Operations* (2 Units)	12.01	12.01	12.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	n/a
Sandblast Operations (1 Unit)	17.74	8.54	0.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	n/a
Metal Parts Cleaning (1 Unit)	0.00	0.00	0.00	0.00	0.00	0.0168	0.00	0.00	0.00	0.00	n/a
Natural Gas Combustion from Heating Units (17 Units)	2.50E-02	9.99E-02	9.99E-02	7.89E-03	1.31E+00	7.23E-02	1.10E+00	1,587.45	2.48E-02	2.37E-02	Hexane
Paved Roads	0.12	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	n/a
Totals	34.69	37.83	22.40	0.01	1.31	0.27	1.10	1587.45	0.02	2.37E-02	Hexane

* The PTE for PM, PM10, and PM2.5 for this grinding operation shown in this table was based on an integral to the process determination for the cyclone and these figures are being used for the permit level determination for the MSOP. For PSD determination, however, PTE before all controls was used. In this determination, the PTE for the grinding operation was 24.02 tons per year, instead of the 12.01 shown above. Therefore, this source is a minor source for PSD, and also meets the criteria for MSOP permit level. Detailed calculations are shown in the Grinding Operations section of these calculation sheets.

**Appendix A: Emission Calculations
Uncontrolled Emissions from Molding Operations**

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
Plt ID: 107-00066
Permit Reviewer: Jack Harmon
Date: 2012

Thirty-one (31) Plastic Injection Molding Machines
Utilizing the Following Raw Materials:
(SCC: 3-08-010-07)

Material Description	Maximum Hours per Year	Maximum Usage (ton/hr)**	Maximum Annual Usage ** (tons/year)	Pollutant	Emission Factor (lb/ton)	PM PTE	PM PTE	PM10 PTE	PM10 PTE	PM2.5 PTE	PM2.5 PTE	VOC	VOC
						(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Mineral Filled Polypropylene	8760	2.66E-01	2328.26	PM, PM10, PM2.5 VOC	0.1302 0.0614	3.46E-02 --	1.52E-01 --	3.46E-02 --	1.52E-01 --	3.46E-02 --	1.52E-01 --	1.63E-02	7.15E-02
High Density Polyethylene	8760	3.20E-03	27.99	PM, PM10, PM2.5 VOC	0.1302 0.0614	4.16E-04 --	1.82E-03 --	4.16E-04 --	1.82E-03 --	4.16E-04 --	1.82E-03 --	1.96E-04	8.59E-04
Copolymer Polypropylene	8760	6.60E-04	5.78	PM, PM10, PM2.5 VOC	0.1302 0.0614	8.59E-05 --	3.76E-04 --	8.59E-05 --	3.76E-04 --	8.59E-05 --	3.76E-04 --	4.05E-05	1.77E-04
Polycarbonate	8760	6.74E-05	0.59	PM, PM10, PM2.5 VOC	0.1302 0.0614	8.77E-06 --	3.84E-05 --	8.77E-06 --	3.84E-05 --	8.77E-06 --	3.84E-05 --	4.14E-06	1.81E-05
Thermoplastic Rubber	8760	1.19E-04	1.04	PM, PM10, PM2.5 VOC	0.1302 0.0614	1.55E-05 --	6.77E-05 --	1.55E-05 --	6.77E-05 --	1.55E-05 --	6.77E-05 --	7.29E-06	3.19E-05
Mold Release Agent	8760	1.26E-05	0.11	VOC	100%*	--	--	--	--	--	--	--	1.10E-01
Totals							1.54E-01		1.54E-01		1.54E-01		1.83E-01

Notes:

Since this operation is a closed injection molding system that heats plastic beads using electric sources, there are no expected emissions from the injection process itself. Therefore, emissions were calculated for the plastic materials used in the process. There are no emission factors in AP-42 for the use of plastic media in a closed molding operation. All factors in AP-42 (Table 6.6.4.2) are for the manufacturing of the raw materials themselves. The source has submitted a request to use emission factors from the Michigan Department of Environmental Quality for Plastic Products Manufacturing, for closed-system molding (SCC: 3-08-010-07)(MDEQ, Publication Fact Sheet #9847 (11/2005) IDEM, OAQ has accepted this emission factor because it specifically references the SCC code that matches this operation, and because there are no AP-42 or WEBFIRE alternatives. The SCC Code has been verified via the EPA website

* Mold Release Agent is an aerosol can release spray operation that is applied by hand, on an as-needed basis, and it is assumed that all VOCs contained in the solution will be emitted.

** Maximum Usage (tons/hr and tons/yr) are for raw materials that are used in all 31 of the plastic injection molding machines combined.

Methodology:

Maximum annual throughput usage provided by source, and is the maximum capacity of all injection molding units combined.

Maximum throughput usage (tons/hr) = maximum annual usage (tons) / 8760 hours per year

PM PTE (lb/hr) = maximum usage (ton/hr) x emission factor (lb/ton)

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

PM 10 PTE, PM2.5 PTE, and VOC PTE calculations use the same method as is used in the calculation for PM PTE

Appendix A: Emission Calculations
Uncontrolled Emissions from Coupling Operations

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
Plt ID: 107-00066
Permit Reviewer: Jack Harmon
Date: 2012

Coupling Machines (2)
 To Machine Plastic Molded parts

Emission Unit Description	Maximum Hours per Year	Material Collected (lb/hr)	Material Collected (ton/yr)	Pollutant	Control Efficiency	Emission Factor* (Particle Size Distribution)	PM PTE	Uncontrolled PM PTE	PM10 PTE	Uncontrolled PM10 PTE	PM2.5 PTE	Uncontrolled PM2.5 PTE	Controlled PM PTE	Controlled PM10 PTE	Controlled PM2.5 PTE
							(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(ton/yr)
Coupling Machines (2)	8760	7.05	30.9	PM	99.00%	15.00%	1.06	4.64	--	--	--	--	0.046	--	--
				PM10	99.00%	55.00%	--	--	3.88	--	--	17.00	--	0.17	--
				PM2.5	99.00%	30.00%	--	--	--	--	2.12	--	9.27	--	0.09
Total Emissions - machining operations						100.00%		4.64		17.00		9.27	0.05	0.17	0.09

Methodology:

Total material collected in fabric filter system, for mass balance evaluation, and was provided by source. Actual collected was based on normal operating hours and was adjusted up to 100% capacity to determine full year collections. (26.0 actual tons collected at 84.19% of maximum capacity = 30.9 tons for 100% maximum capacity.)

Material collected is at the filter before the control.

*Particle size distribution from AP-42, Appendix B.2 (Category 3) and Table B.2.3 for Nonmetallic Minerals

Uncontrolled PTE PM (lb/hr) = Material Collected (lb/hr) x Particle Size Distribution for PM

Uncontrolled PTE PM (ton/yr) = Material Collected (ton/yr) x Particle Size Distribution for PM

Uncontrolled PTE PM10 (lb/hr) = Material Collected (lb/hr) x Particle Size Distribution for PM10

Uncontrolled PTE PM10 (ton/yr) = Material Collected (ton/yr) x Particle Size Distribution for PM10

Uncontrolled PTE PM2.5 (lb/hr) = Material Collected (lb/hr) x Particle Size Distribution for PM2.5

Uncontrolled PTE PM2.5 (ton/yr) = Material Collected (ton/yr) x Particle Size Distribution for PM2.5

Controlled PTE PM (tons/yr) = Controlled PM PTE (tons/yr) *(1-control efficiency)

Controlled PTE PM10 (tons/yr) = Controlled PM10 PTE (tons/yr) *(1-control efficiency)

Controlled PTE PM2.5 (tons/yr) = Controlled PM2.5 PTE (tons/yr) *(1-control efficiency)

Appendix A: Emission Calculations
Uncontrolled Emissions From Grinding and Sandblasting Operations

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
Plt ID: 107-00066
Permit Reviewer: Jack Harmon
Date: 2012

Grinding Operations

Emission Unit	Hours of Operation (hr/yr)	Baghouse Airflow (dscf)	Emission Factor	Control Efficiency	Uncontrolled PTE PM Before Controls (ton/yr)	Uncontrolled PTE PM10 Before Controls (ton/yr)	Uncontrolled PTE PM2.5 Before Controls (ton/yr)	Uncontrolled PTE PM After Cyclone (ton/yr)	Uncontrolled PTE PM10 After Cyclone (ton/yr)	Uncontrolled PTE PM2.5 After Cyclone (ton/yr)	Controlled PTE PM After Baghouse (ton/yr)	Controlled PTE PM10 After Baghouse (ton/yr)	Controlled PTE PM2.5 After Baghouse (ton/yr)
Grinder #1 - Molding Department Regrind of plastic scrap for recycling SCC: 40202299	8,760	1,400	0.01 (grains/dscf)	90% Cyclone	10.51	10.51	10.51	5.26	5.26	5.26	0.53	0.53	0.53
				95% Bag filter									
Grinder #2 - Molding Department Regrind of plastic scrap for recycling SCC: 40202299	8,760	1,800	0.01 (grains/dscf)	90% Cyclone	13.52	13.52	13.52	6.76	6.76	6.76	0.68	0.68	0.68
				95% Bag filter									
Total					24.027	24.027	24.027	12.014	12.014	12.014	1.201	1.201	1.201

Notes:

The Grinding Operation consists of two controls: a cyclone and a baghouse. The cyclone separates the plastic chips from the particulate and drops the chips down to a bin for re-use. The baghouse controls the particulate. The cyclone has been evaluated and determined to be integral to the grinding process, since it functions as a separator for the sole purpose of product recovery. Therefore, the potential to emit after the cyclone will be used to determine the permit level. The potential to emit before the controls will be used to determine applicability of Prevention of Significant Deterioration (PSD), pursuant to 326 IAC 2-2. The baghouse has been evaluated and determined to not be integral to the process, since there is no product recovery and because its purpose is air pollution control. PM is presumed to be equal to PM10 and PM2.5.

Methodology:

Controlled PTE PM, PM10, PM2.5 (ton/yr) = 8760 (hrs/yr) x 1400 (dscf) x Emission Factor (gr/dscf) x 60 / 7000 / 2000 (lb/ton)
 Uncontrolled PTE PM, PM10, PM2.5 (ton/yr) After cyclone = Controlled PTE PM / (1-CE of Cyclone); where control efficiency of the cyclone = 90%. This calculation was used in the permit level determination, as discussed above.
 Uncontrolled PTE PM, PM10, PM2.5 (ton/yr) Before controls = Controlled PTE PM / (1-CE of Baghouse); where control efficiency of the baghouse = 95%. This calculation was used in the PSD determination, as discussed above.

Sandblast Operations

Emission Unit	Hours of Operation (hr/yr)	Media Usage (lb/hr)	Media Usage (lb/yr)	Media Usage (ton/yr)	Control Efficiency	Pollutant	Emission Factor (lb/1000 lb media)	Potential PM (lbs/hr)	Potential PM (ton/yr)	Potential PM10 (lbs/hr)	Potential PM10 (ton/yr)	Potential PM2.5 (lbs/hr)	Potential PM2.5 (ton/yr)
Sandblast Unit SCC: 3-09-002-02	8,760	150	1,314,000	657	99%	PM PM10 PM2.5	27	4.0500	17.7390	1.9500	8.5410	0.1950	0.8541
							13						
							1.3						
Total								4.0500	17.7390	1.9500	8.5410	0.1950	0.8541

Notes:

Emission Factors are from AP-42, Table 13.2.6-1 for Abrasive Blasting
 The Cartridge filter system for the sandblast unit has been evaluated and has been determined to not be integral to the process.; therefore, the PTE for PM, PM10, and PM2.5 are based on uncontrolled emissions.

Methodology:

PM PTE (lb/hr) = Media Usage (lb/hr) x emission factor (lb/1000lb media) / 1000
 PM PTE (ton/yr) = PM PTE (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)
 PM10 PTE and PM2.5 PTE calculations use the same methodology as above.

**Appendix A: Emission Calculations
Uncontrolled Emissions from Metal Parts Cleaning Operations**

Company Name: Banjo Corporation
 Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
 Permit Number: 107-31231-00066
 Plt ID: 107-00066
 Permit Reviewer: Jack Harmon
 Date: 2012

Emission Unit	Potential Hours of Operations	Max Usage (lb/hr)	Max Usage (ton/yr)	Pollutant	VOC Content (by Weight)	Source of Emission Factor	Potential PM (Tons/Year)	Potential PM (lbs/hr)	Potential PM10 (Tons/Year)	Potential PM10 (lbs/hr)	Potential VOC (Tons/Year)	Potential VOC (lbs/hr)
Metal Parts Cleaning Solution	8,760	0.55	2.40	VOC PM, PM10, PM2.5	0.70%	(MSDS) none	0.00	0.00	0.00	0.00	0.0168	0.0038
Total							0.00	0.00	0.00	0.00	0.0168	0.0038

Methodology:

Maximum annual usage based on actual usage at normal operating times, increased to annual rate by using 8760 hours per year.
 This operation is not a mass production operation, but, rather, only used on an as-needed basis.
 VOC content supplied by the source and came from the Material Safety Data Sheets (MSDS).
 There are no HAPs associated with this solution.
 There are no PM, PM10, or PM2.5 emissions from this operation.
 PTE VOC emissions (tons/yr) = Max Usage (Tons/yr) x VOC Content (%)

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

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
Plt ID: 107-00066
Reviewer: Jack Harmon
Date: 2012

Heat Input Capacity MMBtu/hr***	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.0	1000	26.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.02	0.10	0.10	0.01	1.31	0.07	1.10

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

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

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

***See Combustion Units Listing page in these calculations for the detailed listing of all the combustion units represented in the MMBtu/hr figure shown above.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

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

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
Plt ID: 107-00066
Reviewer: Jack Harmon
Date: 2012

HAPs - Organics						Total
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	2.761E-05	1.578E-05	9.862E-04	2.367E-02	4.471E-05	2.474E-02
HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	6.574E-06	1.446E-05	1.841E-05	4.997E-06	2.761E-05	7.206E-05
Grand Total						2.481E-02

Methodology is the same as page 1.

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

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

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
Plt ID: 107-00066
Reviewer: Jack Harmon
Date: 2012

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,578	0.0	0.0
Summed Potential Emissions in tons/yr	1,578		
CO2e Total in tons/yr	1,587.45		

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.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations
Fugitive Emissions from Paved Roads

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
PR ID: 107-00066
Permit Reviewer: Jack Harmon
Date: 2012

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (miles/day)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Passenger Cars	220.0	2.0	440.0	2.5	2.5	740	0.140	61.6	22484.0
Small Delivery Vans	4.0	2.0	8.0	2.5	2.5	740	0.140	1.12	408.8
Semi Trucks	8.0	2.0	16.0	1.0	40.0	740	0.140	2.24	817.6
Totals									23710.4

Average Vehicle Weight Per Trip = 1.0 tons/trip
 Average Miles Per Trip = 1.89 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	3.79	3.79	3.79	tons = average vehicle weight (provided by source)
sL =	1.2	1.2	1.2	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.087	0.017	0.0043	lb/mile
Mitigated Emission Factor, Eext =	0.080	0.016	0.0039	lb/mile
Dust Control Efficiency =	50%	50%	50%	

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Passenger Cars	0.03	0.01	0.00	0.03	0.01	0.00	0.01	0.00	0.00
Small Delivery Vans	0.03	0.01	0.00	0.03	0.01	0.00	0.01	0.00	0.00
Semi Trucks	0.03	0.01	0.00	0.03	0.01	0.00	0.01	0.00	0.00
Totals	0.12	0.02	0.01	0.11	0.02	0.01	0.05	0.01	0.00

Methodology

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

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit

**Appendix A: Emission Calculations
Listing of Natural Gas-fired Heating Units**

Company Name: Banjo Corporation
Address City IN Zip: 150 Banjo Drive, Crawfordsville, Indiana 47933
Permit Number: 107-31231-00066
Pit ID: 107-00066
Permit Reviewer: Jack Harmon
Date: 2012

<For Reference Only>

Heating Unit ID	Maximum Heat Input Capacity Rating (MMBtu/hr)
Modine - NE Warehouse Space Heater	0.200 MMBtu/hr
Modine - Receiving Space Heater	0.180 MMBtu/hr
Lennox - Molding Department Space Heaters (2 units @ 0.30 MMBtu ea)	0.600 MMBtu/hr
Robert Gordon - Pump Room Space Heater	0.150 MMBtu/hr
Lambert - Production Department Space Heater	0.100 MMBtu/hr
Reznor - Shipping Department Space Heater (3 units @0.12 ea)	0.360 MMBtu/hr
Reznor - Shipping Department Space Heater	0.150 MMBtu/hr
Modine - Shipping Department Space Heater	0.125 MMBtu/hr
York - Assembly/Test Office Space Heater	0.117 MMBtu/hr
Carrier - Front Office Comfort Heater	0.360 MMBtu/hr
York - Molding Offices Comfort Heater	0.300 MMBtu/hr
Reznor - Shipping Department Space Heaters (3 units@ 0.12 ea)	0.360 MMBtu/hr
Total 17 units	Total 3.002 MMBtu/hr



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Richelle Pack
Banjo Corporation
150 Banjo Dr
Crawfordsville, IN 47933

DATE: July 26, 2012

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

SUBJECT: Final Decision
MSOP
107-31231-00066

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:
Russ Farmer (Director – Operations)
Leigh Anne Harvey (Environ International Corp)
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

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Commissioner

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(317) 232-8603
Toll Free (800) 451-6027
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July 26, 2012

TO: Crawfordsville Public Library

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

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

Applicant Name: Banjo Corporation
Permit Number: 107-31231-00066

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	MIDENNEY 7/26/2012 Banjo Corporation 107-31231-00066 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Richelle Pack Banjo Corporation 150 Banjo Dr Crawfordsville IN 47933 (Source CAATS) via confirm delivery									
2		Russ Farmer Dir - Ops Banjo Corporation 150 Banjo Dr Crawfordsville IN 47933 (RO CAATS)									
3		Crawfordsville City Council and Mayors Office 300 E. Pike St Crawfordsville IN 47933 (Local Official)									
4		Montgomery County Health Department 110 W. South Blvd Suite 100 Crawfordsville IN 47933-3351 (Health Department)									
5		Mr. Robert Ford RR 1, Box 233 New Ross IN 47968 (Affected Party)									
6		Ms. Magie Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)									
7		Montgomery County Commissioner 110 West South Boulevard Crawfordsville IN 47933 (Local Official)									
8		Ms. Leigh Anne Harvey ENVIRON International Corp. One Indiana Square Suite 2550 Indianapolis In 46204 (Consultant)									
9		Crawfordsville Public Library 205 South Washington Street Crawfordsville IN 47933 (Library)									
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