



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: August 27, 2012

RE: Buckhorn, Inc. / 179-31710-00024

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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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Buckhorn, Inc.**  
**785 S. Decker Drive**  
**Bluffton, Indiana 46714**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F 179-31710-00024	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 27, 2012  Expiration Date: August 27, 2022

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary high density polyethylene structural foam production source.

Source Address:	785 S. Decker Drive, Bluffton, Indiana 46714
General Source Phone Number:	(260) 487-7491
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
County Location:	Wells
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) raw material receiving and handling process, identified as Raw1, consisting of the following units:
  - (1) Two (2) silos, identified as S101 and S102, constructed in 1998, with a maximum capacity of 3,125 pounds per hour each, both controlled by a baghouse, identified as V2, exhausting through vent V2;
  - (2) Two (2) silos, identified as S103 and S104, constructed in 1998, with a maximum capacity of 3,125 pounds per hour each, both controlled by a baghouse, identified as V3, exhausting through vent V3; and
  - (3) One (1) vacuum receiver, identified as Receiver1, constructed in 1998, with a maximum capacity of 28,000 pounds per hour, controlled by a filter, identified as V1, exhausting through vent V1.
- (b) One (1) intermediate material handling process, identified as Intermediate1, consisting of the following units:
  - (1) Two (2) surge bins, identified as SB01 and SB02, constructed in 1998, with a maximum capacity of 12,500 pounds per hour, controlled by two (2) baghouses, identified as V4 and V5, respectively, exhausting indoors.
  - (2) One (1) pressure receiver, identified as VF06, constructed in 1998, with a maximum capacity of 15,500 pounds per hour, controlled by a filter, identified V6, exhausting indoors.

(c) Vacuum Receivers

- (1) Two (2) vacuum receivers, identified as Receiver2 and Receiver3, constructed in 1998, with a maximum capacity of 600 pounds per hour each, both receivers controlled by a filter, exhausting indoors.
- (2) Eight (8) vacuum receivers, identified as Receiver4 - Receiver11, constructed in 1998, with a maximum capacity of 1,200 pounds per hour each, each two receivers controlled by a filter, exhausting indoors.
- (3) One (1) vacuum receiver, identified as Receiver12, constructed in 1998, with a maximum capacity of 3,600 pounds per hour, controlled by a filter, exhausting indoors.

(d) High density polyethylene extrusion processes, consisting of:

- (1) Two (2) extruders/injection molding presses, identified as Presses 31 and 32, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.
- (2) One (1) extruder/injection molding process, identified as Press 33, constructed in 2007, with a maximum capacity of 1000 pounds of polyethylene foam per hour.
- (3) Two (2) extruders/injection molding presses, identified as Presses 41 and 42, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.
- (4) One (1) extruder/injection molding process, identified as Press 43, constructed in 2007, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (5) Two (2) extruders/injection molding presses, identified as Presses 51 and 52, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.
- (6) One (1) extruder/injection molding process, identified as Press 53, constructed in 2007, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (7) One (1) extruder/injection molding press, identified as Press 61, constructed in 1998, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (8) One (1) extruder/injection molding process, identified as Press 62, constructed in 1998, approved for modification in 2012, with a maximum capacity of 2,400 pounds polyethylene foam per hour.
- (9) One (1) extruder/injection molding process, identified as Press 63, approved for construction in 2012, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (10) One (1) extruder/injection molding process, identified as Press 71, constructed in 2007, with a maximum capacity of 500 pounds polyethylene foam per hour.
- (11) One (1) extruder/injection molding process, identified as Press 81, constructed in 2007, with a maximum capacity of 300 pounds of polyethylene foam per hour.

- (12) One (1) extruder/injection molding process, identified as Press 82, constructed in 2007, with a maximum capacity of 200 pounds of polyethylene foam per hour.
- (13) One (1) extruder/injection molding process, identified as Press 83, constructed in 2007, with a maximum capacity of 300 pounds of polyethylene foam per hour.
- (e) One (1) grinding operation, identified as GR1, with a maximum capacity of 800 pounds of polyethylene scrap per hour, utilizing a cyclone and baghouse for particulate control, exhausting inside.
- (f) One (1) regrinding silo, identified as S105, constructed in 2007, with a maximum capacity of grinding 12,500 pounds of polyethylene scrap per hour, utilizing a baghouse for particulate control, exhausting inside the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Seven (7) natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) British thermal units per hour, total heat input capacity: 4.75 million British thermal units per hour.
- (b) Vessels storing hydraulic oils.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Closed loop heating and cooling systems.
- (e) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (f) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (g) Blowdown for compressors.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F 179-31710-00024, is issued for a fixed term of ten (10) 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

### B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

### B.5 Severability [326 IAC 2-8-4(4)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

### B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
  - (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F 179-31710-00024 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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]

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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]

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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]

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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]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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]**

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

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

### **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

#### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) raw material receiving and handling process, identified as Raw1, consisting of the following units:
  - (1) Two (2) silos, identified as S101 and S102, constructed in 1998, with a maximum capacity of 3,125 pounds per hour each, both controlled by a baghouse, identified as V2, exhausting through vent V2;
  - (2) Two (2) silos, identified as S103 and S104, constructed in 1998, with a maximum capacity of 3,125 pounds per hour each, both controlled by a baghouse, identified as V3, exhausting through vent V3; and
  - (3) One (1) vacuum receiver, identified as Receiver1, constructed in 1998, with a maximum capacity of 28,000 pounds per hour, controlled by a filter, identified as V1, exhausting through vent V1.
- (b) One (1) intermediate material handling process, identified as Intermediate1, consisting of the following units:
  - (1) Two (2) surge bins, identified as SB01 and SB02, constructed in 1998, with a maximum capacity of 12,500 pounds per hour, controlled by two (2) baghouses, identified as V4 and V5, respectively, exhausting indoors.
  - (2) One (1) pressure receiver, identified as VF06, constructed in 1998, with a maximum capacity of 15,500 pounds per hour, controlled by a filter, identified V6 exhausting indoors.
- (c) Vacuum Receivers
  - (1) Two (2) vacuum receivers, identified as Receiver2 and Receiver3, constructed in 1998, with a maximum capacity of 600 pounds per hour each, both receivers controlled by a filter, exhausting indoors.
  - (2) Eight (8) vacuum receivers, identified as Receiver4 - Receiver11, constructed in 1998, with a maximum capacity of 1,200 pounds per hour each, each two receivers controlled by a filter, exhausting indoors.
  - (3) One (1) vacuum receiver, identified as Receiver12, constructed in 1998, with a maximum capacity of 3,600 pounds per hour, controlled by a filter, exhausting indoors.
- (d) High density polyethylene extrusion processes, consisting of:
  - (1) Two (2) extruders/injection molding presses, identified as Presses 31 and 32, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.
  - (2) One (1) extruder/injection molding process, identified as Press 33, constructed in 2007, with a maximum capacity of 1000 pounds of polyethylene foam per hour.

- (3) Two (2) extruders/injection molding presses, identified as Presses 41 and 42, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.
- (4) One (1) extruder/injection molding process, identified as Press 43, constructed in 2007, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (5) Two (2) extruders/injection molding presses, identified as Presses 51 and 52, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.
- (6) One (1) extruder/injection molding process, identified as Press 53, constructed in 2007, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (7) One (1) extruder/injection molding press, identified as Press 61, constructed in 1998, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (8) One (1) extruder/injection molding process, identified as Press 62, constructed in 1998, approved for modification in 2012, with a maximum capacity of 2,400 pounds polyethylene foam per hour.
- (9) One (1) extruder/injection molding process, identified as Press 63, approved for construction in 2012, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (10) One (1) extruder/injection molding process, identified as Press 71, constructed in 2007, with a maximum capacity of 500 pounds polyethylene foam per hour.
- (11) One (1) extruder/injection molding process, identified as Press 81, constructed in 2007, with a maximum capacity of 300 pounds of polyethylene foam per hour.
- (12) One (1) extruder/injection molding process, identified as Press 82, constructed in 2007, with a maximum capacity of 200 pounds of polyethylene foam per hour.
- (13) One (1) extruder/injection molding process, identified as Press 83, constructed in 2007, with a maximum capacity of 300 pounds of polyethylene foam per hour.
- (e) One (1) grinding operation, identified as GR1, with a maximum capacity of 800 pounds of polyethylene scrap per hour, utilizing a cyclone and baghouse for particulate control, exhausting inside.
- (f) One (1) regrinding silo, identified as S105, constructed in 2007, with a maximum capacity of grinding 12,500 pounds of polyethylene scrap per hour, utilizing a baghouse for particulate control, exhausting inside the building.

(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 2-8-4(1)]**

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

In order to render 326 IAC 2-2 not applicable, the PM emissions from the one (1) grinding operation, identified as GR1, shall be less than 2.22 pounds per hour.

Compliance with this PM limit, combined with the limited PM potential to emit (PTE) from other emission units at this source, shall limit the source-wide total potential to emit PM to less than 250 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

**D.1.2 FESOP Limits: PM10 and PM2.5 [326 IAC 2-8-4] [326 IAC 2-2]**

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

Emission Units/Control Devices	Maximum Capacity (Pounds per hour)	Limits PM10 (Pounds per hour)	Limits PM2.5 (Pounds per hour)
Raw1			
S101 & S102/Baghouse V2	6,250	1.57	1.57
S103 & S104/Baghouse V3	6,250	1.57	1.57
Receiver1/Filter V1	15,500	7.05	7.05
Intermediate 1			
SB01/Baghouse V4	6,250	1.02	1.02
SB02/Baghouse V5	6,250	1.02	1.02
ReceiverVF06/Filter V6	15,500	2.53	2.53
Receivers/each with a filter			
Receiver 2	600	0.220	0.220
Receiver 3	600	0.220	0.220
Receiver 4	1,200	0.439	0.439
Receiver 5	1,200	0.439	0.439
Receiver 6	1,200	0.439	0.439
Receiver 7	1,200	0.439	0.439
Receiver 8	1,200	0.439	0.439
Receiver 9	1,200	0.439	0.439
Receiver 10	1,200	0.439	0.439
Receiver 11	1,200	0.439	0.439
Receiver 12	3,600	1.32	1.32
GR1/Baghouse	800	2.22	2.22
S105/Baghouse	12,500	0.47	0.47

Compliance with these limits, combined with the potential to emit PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, and PM2.5 to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-2 (PSD) not applicable.

**D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

Particulate emissions from each unit shall not exceed the pounds per hour limit listed in the table below:

Emission Units	Process Weight Rate (pounds per hour )	Limits PM (pounds per hour)
Raw1		
Silo S101	3125	5.53
Silo S102	3125	5.53
Silo S103	3125	5.53
Silo S104	3125	5.53
Receiver1	28,000	24.03
Intermediate1		
Surge Bin SB01	6250	8.80
Surge Bin SB01	6250	8.80
Receiver VF06	15,500	16.17
Receivers		
Receiver 2	600	1.83
Receiver 3	600	1.83
Receiver 4	1,200	2.91
Receiver 5	1,200	2.91
Receiver 6	1,200	2.91
Receiver 7	1,200	2.91
Receiver 8	1,200	2.91
Receiver 9	1,200	2.91
Receiver 10	1,200	2.91
Receiver 11	1,200	2.91
Receiver 12	3,600	6.08
GR1	800	2.22
S105	12,500	14.0

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

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

**D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

**Compliance Determination Requirements**

**D.1.5 Particulate Control**

In order to comply with Conditions D.1.1, D.1.2, and D.1.3 (for S105) a baghouse and/or a filter for particulate control shall be in operation and control emissions from the operation at all times that the associated emission units are in operation.

**Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**D.1.6 Visible Emissions Notations**

- (a) Daily visible emission notations of the raw material receiving and handling process, identified as Raw1 stack exhausted V1, V2 and V3, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### D.1.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouses, used in conjunction with the raw material receiving and handling process, identified as Raw1, the grinding operations, identified as GR1 and the regrinding, identified as S105, at least once per day when the process is in operation and venting to the atmosphere. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 3.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

#### D.1.8 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

#### D.1.9 Cyclone Failure Detection

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- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been

repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.6, the Permittee shall maintain a daily record of visible emission notations of the stack exhaust of raw material receiving and handling process, identified as V1, V2 and V3. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the raw material receiving and handling process did not operate that day).
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the raw material receiving and handling process, identified as Raw1, and the grinding operations, identified as GR1 and the regrinding, identified as S105. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the raw material receiving and handling process did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligation with regard to the records required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Buckhorn, Inc.  
Source Address: 785 S. Decker Drive, Bluffton, Indiana 46714  
FESOP Permit No.: F 179-31710-00024

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Buckhorn, Inc.  
Source Address: 785 S. Decker Drive, Bluffton, Indiana 46714  
FESOP Permit No.: F 179-31710-00024

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Buckhorn, Inc.  
Source Address: 785 S. Decker Drive, Bluffton, Indiana 46714  
FESOP Permit No.: F 179-31710-00024

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

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Addendum to the Technical Support Document (ATSD) for a  
New Source Review and Federally Enforceable State Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Buckhorn, Inc.</b>
<b>Source Location:</b>	<b>785 S. Decker Drive, Bluffton, Indiana 46714</b>
<b>County:</b>	<b>Wells</b>
<b>SIC Code:</b>	<b>3089 (Plastics Products, Not Elsewhere Classified)</b>
<b>Permit Renewal No.:</b>	<b>F 179-31710-00024</b>
<b>Permit Reviewer:</b>	<b>Renee Traivaranon</b>

On July 24, 2012, the Office of Air Quality (OAQ) had a notice published in Bluffton News Banner in Bluffton, Indiana, stating that Buckhorn, Inc. had applied to renew its operating permit for a Federally Enforceable State Operating Permit Renewal and to add an extruder and injection molding process. The notice also stated that the OAQ proposed to issue a New Source Review and Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

No comments were received during the public notice period.

**Additional Changes**

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) Preventive Maintenance Plan is required for this source, since it is operated under the Federally Enforceable State Operating Permit; therefore, Condition D.1.4 Preventive Maintenance Plan has been added to the permit as follows:

**D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

**IDEM Contact**

- (a) Questions regarding this proposed New Source Review and Federally Enforceable State Operating Permit Renewal can be directed to Ms. Renee Traivaranon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5615) or toll free at 1-800-451-6027 extension (4-5615).
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

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

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

**Technical Support Document (TSD) for a New Source Review and Federally  
Enforceable State Operating Permit Renewal**

<b>Source Background and Description</b>
--

<b>Source Name:</b>	<b>Buckhorn, Inc.</b>
<b>Source Location:</b>	<b>785 S. Decker Drive, Bluffton, Indiana 46714</b>
<b>County:</b>	<b>Wells</b>
<b>SIC Code:</b>	<b>3089 (Plastics Products, Not Elsewhere Classified)</b>
<b>Permit Renewal No.:</b>	<b>F 179-31710-00024</b>
<b>Permit Reviewer:</b>	<b>Renee Traivaranon</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Buckhorn, Inc. relating to the operation of a high density polyethylene structural foam production source. On April 4, 2012, Buckhorn, Inc. submitted an application to the OAQ requesting to renew its operating permit, and construct an extruder and injection molding process. Buckhorn, Inc. was issued a New Source Review and FESOP No. F179 - 24865 - 00024, on January 9, 2008.

<b>Permitted Emission Units and Pollution Control Equipment</b>
---

The source consists of the following existing permitted emission units:

- (a) One (1) raw material receiving and handling process, identified as Raw1, consisting of the following units:
  - (1) Two (2) silos, identified as S101 and S102, constructed in 1998, with a maximum capacity of 3,125 pounds per hour each, both controlled by a baghouse, identified as V2, exhausting through vent V2;
  - (2) Two (2) silos, identified as S103 and S104, constructed in 1998, with a maximum capacity of 3,125 pounds per hour each, both controlled by a baghouse, identified as V3, exhausting through vent V3; and
  - (3) One (1) vacuum receiver, identified as Receiver1, constructed in 1998, with a maximum capacity of 28,000 pounds per hour, controlled by a filter, identified as V1, exhausting through vent V1.

[Note: This is the only vacuum receiver that exhausts outdoors.]
- (b) One (1) intermediate material handling process, identified as Intermediate1, consisting of the following units:
  - (1) Two (2) surge bins, identified as SB01 and SB02, constructed in 1998, with a maximum capacity of 12,500 pounds per hour, controlled by two (2) baghouses, identified as V4 and V5, respectively, exhausting indoors.
  - (2) One (1) pressure receiver, identified as VF06, constructed in 1998, with a maximum capacity of 15,500 pounds per hour, controlled by a filter, identified V6, exhausting indoors.

(c) Vacuum Receivers

- (1) Two (2) vacuum receivers, identified as Receiver2 and Receiver3, constructed in 1998, with a maximum capacity of 600 pounds per hour each, both receivers controlled by a filter, exhausting indoors.
- (2) Eight (8) vacuum receivers, identified as Receiver4 - Receiver11, constructed in 1998, with a maximum capacity of 1,200 pounds per hour each, each two receivers controlled by a filter, exhausting indoors.
- (3) One (1) vacuum receiver, identified as Receiver12, constructed in 1998, with a maximum capacity of 3,600 pounds per hour, controlled by a filter, exhausting indoors.

[Note: For clarification, the descriptions of above units (a) to (c) have been updated per the source's request, these are not units' physical modification.]

(d) High density polyethylene extrusion processes, consisting of:

Note: The source requested to change the molding presses identifications as follows:

Press#	Buckhorn#
1	31
2	32
3	51
4	52
5	41
6	42
7	61
8	62
9	71
10	53
11	81
12	82
13	33
14	43
15	44
16	83
17	63

*The above items for molding presses have been re-ordered as follows:*

- (1) Two (2) extruders/injection molding presses, identified as Presses 31 and 32, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.
- (2) One (1) extruder/injection molding process, identified as Press 33, constructed in 2007, with a maximum capacity of 1000 pounds of polyethylene foam per hour.
- (3) Two (2) extruders/injection molding presses, identified as Presses 41 and 42, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.

- (4) One (1) extruder/injection molding process, identified as Press 43, constructed in 2007, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (5) Two (2) extruders/injection molding presses, identified as Presses 51 and 52, constructed in 1998, each with a maximum capacity of 500 pounds of polyethylene foam per hour.
- (6) One (1) extruder/injection molding process, identified as Press 53, constructed in 2007, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (7) One (1) extruder/injection molding press, identified as Press 61, constructed in 1998, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (8) One (1) extruder/injection molding process, identified as Press 62, constructed in 1998, approved for modification in 2012, with a maximum capacity of 2,400 pounds polyethylene foam per hour.
- (9) One (1) extruder/injection molding process, identified as Press 63, approved for construction in 2012, with a maximum capacity of 2,400 pounds of polyethylene foam per hour.
- (10) One (1) extruder/injection molding process, identified as Press 71, constructed in 2007, with a maximum capacity of 500 pounds polyethylene foam per hour.
- (11) One (1) extruder/injection molding process, identified as Press 81, constructed in 2007, with a maximum capacity of 300 pounds of polyethylene foam per hour.
- (12) One (1) extruder/injection molding process, identified as Press 82, constructed in 2007, with a maximum capacity of 200 pounds of polyethylene foam per hour.
- (13) One (1) extruder/injection molding process, identified as Press 83, constructed in 2007, with a maximum capacity of 300 pounds of polyethylene foam per hour.
- (e) One (1) grinding operation, identified as GR1, with a maximum capacity of 800 pounds of polyethylene scrap per hour, utilizing a cyclone and baghouse for particulate control, exhausting inside.
- (f) One (1) regrinding silo, identified as S105, constructed in 2007, with a maximum capacity of grinding 12,500 pounds of polyethylene scrap per hour, utilizing a baghouse for particulate control, exhausting inside the building.

<b>Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit</b>
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The following are emission units which are added to the permit during this renewal:

- (a) One (1) regrinding silo, identified as S105, constructed in 2007, with a maximum capacity of grinding 12,500 pounds of polyethylene scrap per hour, utilizing a baghouse for particulate control, exhausting inside the building.
- (b) One (1) extruder/injection molding process, identified as Press 83, constructed in 2007, with a maximum capacity of 300 pounds polyethylene foam per hour.

- (c) One (1) extruder/injection molding process, identified as Press 63, approved for construction in 2012, with a maximum capacity of 2,400 pounds polyethylene foam per hour.

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

One (1) extruder/injection molding process, identified as Press 44, constructed in 2007, capacity: 2,400 pounds polyethylene foam per hour.

**Insignificant Activities**

The source also consists of the following insignificant activities:

- (a) Seven (7) natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) British thermal units per hour, total heat input capacity: 4.75 million British thermal units per hour.
- (b) Vessels storing hydraulic oils.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Closed loop heating and cooling systems.
- (e) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (f) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (g) Blowdown for compressors.

**Existing Approvals**

This source has been operated under FESOP No. F179 - 24865 - 00024, issued on January 9, 2008. There are no other approvals/permits issued for this source since this permit was issued.

**Enforcement Issue**

There are no enforcement actions pending related to this application.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Wells County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Wells County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Wells County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Wells County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	355.41
PM <sub>10</sub>	355.53
PM <sub>2.5</sub>	355.53
SO <sub>2</sub>	0.01
VOC	38.00
CO	1.75
NO <sub>x</sub>	2.08
GHGs as CO <sub>2</sub> e	2,511.79
Single HAP	3.79
Total HAP	3.83

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub> and PM<sub>2.5</sub> is greater than 100 tons per year. However, the Permittee has agreed to continue limiting the PM<sub>10</sub> and PM<sub>2.5</sub> emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

<b>Potential to Emit After Issuance</b>
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The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Raw Material	70.96	44.63	44.63	-	-	-	-	-	-	-
Intermediate1	49.06	20.02	20.02	-	-	-	-	-	-	-
Vacuum Receivers (#2-#12)	25.23	23.09	23.09	-	-	-	-	-	-	-
Sixteen (16) Molding Presses	-	-	-	-	-	37.89	-	-	3.79	3.79 (Acetaldehyde)
Grinding/GR1	9.72	9.72	9.72	-	-	-	-	-	-	-
Re-grinding/S105	41.06	2.05	2.05	-	-	-	-	-	-	-
Combustion units	0.04	0.16	0.16	0.01	2.08	0.11	1.75	2,511.79	0.04	0.037 (Hexane)
<b>Total PTE of Entire Source</b>	<b>196.06</b>	<b>99.67</b>	<b>99.67</b>	<b>0.01</b>	<b>2.08</b>	<b>38.00</b>	<b>1.75</b>	<b>1,411.79</b>	<b>3.83</b>	<b>3.79</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO <sub>2e</sub>	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO <sub>2e</sub>	NA	NA

- = negligible or none  
\*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".  
\*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

(a) FESOP:

In order to comply with FESOP, the source shall comply with the following limits:

Emission Units/Control Devices	Maximum Capacity (Pounds per hour)	Limits PM10/PM2.5 (Pounds per hour)
Raw1		
S101 & S102/Baghouse V2	6,250	1.57
S103 & S104/Baghouse V3	6,250	1.57
Receiver1/Filter V1	28,000	7.05
Intermediate 1		
SB01/Baghouse V4	6,250	1.02
SB02/Baghouse V5	6,250	1.02
ReceiverVF06/Filter V6	15,500	2.53
Receivers/each with a filter		
Receiver 2	600	0.220
Receiver 3	600	0.220
Receiver 4	1,200	0.439
Receiver 5	1,200	0.439
Receiver 6	1,200	0.439
Receiver 7	1,200	0.439
Receiver 8	1,200	0.439
Receiver 9	1,200	0.439
Receiver 10	1,200	0.439
Receiver 11	1,200	0.439
Receiver 12	3,600	1.32
GR1/Baghouse	800	2.22
S105/Baghouse	12,500	0.47

- (1) The potential to emit of PM10 and PM2.5 from raw material handling process (Raw1), shall not exceed the following limits:
  - (a) The potential to emit of PM10 and PM2.5 from Silos S101 and S102 shall not exceed 1.57 pounds per hour.
  - (b) The potential to emit of PM10 and PM2.5 from Silos S103 and S104 shall not exceed 1.57 pounds per hour.
  - (c) The potential to emit of PM10 and PM2.5 from Receiver1 shall not exceed 7.05 pounds per hour.

*This is an existing limit of 10.2 pounds per hour for the Raw1, but the above units were constructed with two baghouses and one filter. In order to enforce the limit, the existing limit has been divided among the control devices and according to the emission unit's capacity.*

- (2) The potential to emit of PM10 and PM2.5 from intermediate handling process Intermediate1, shall not exceed the following limits:
  - (a) The potential to emit of PM10 and PM2.5 from the surge bin SB01 shall not exceed 1.02 pounds per hour.
  - (b) The potential to emit of PM10 and PM2.5 from the surge bin SB02 shall not exceed 1.02 pounds per hour.
  - (c) The potential to emit of PM10 and PM2.5 from the Receiver VF06 shall not exceed 2.53 pounds per hour.

*This is an existing limit of 4.57 pounds per hour for the Intermediate1, but the above units were constructed with two baghouses and one filter. In order to enforce the limit, the existing limit has been divided among the control devices and according to the emission unit's capacity.*

- (3) The potential to emit of PM10 and PM2.5 from each receiver; Receiver 2 and Receiver 3, shall not exceed 0.220 pounds per hour. *This is an existing limit for the source.*
- (4) The potential to emit of PM10 and PM2.5 from each receiver; Receiver 4 through Receiver 11, shall not exceed 0.439 pounds per hour. *This is an existing limit for the source.*
- (5) The potential to emit of PM10 and PM2.5 from Receiver 12 shall not exceed 1.32 pounds per hour. *This is an existing limit for the source.*
- (6) The potential to emit of PM10 and PM2.5 from grinder, identified as GR1, shall not exceed 2.22 pounds per hour. *This is an existing limit for the source.*
- (7) The potential to emit of PM10 and PM2.5 from re-grinder, identified as S105, shall not exceed 0.47 pounds per hour. This is a new limit requirement for the source.

Compliance with these limits, combined with the potential to emit PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, and PM2.5 to less than 100 tons per 12 consecutive month period each, and shall

render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

(b) PSD Minor Source

This source is still a PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be limited to less than the PSD major source threshold levels.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM emissions from the grinding operation (GR1) shall not exceed 2.22 pounds per hour. *This is an existing limit for this source.*

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.

<b>Federal Rule Applicability</b>
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**New Source Performance Standards (NSPS)**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

**National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Group IV Polymers and Resins, 40 CFR 63, Subpart JJJ (326 IAC 20), are not included in this permit because this source does not process or manufacture a thermoplastic product as defined by 40 CFR 63.1312 and the source is not a major source for HAPs.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW (326 IAC 20), are not included in this permit because this source is not a major source of HAPs.
- (c) 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 (326 IAC 20), are not included in this permit because this source does not produce polyvinyl chloride and copolymers.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

**Compliance Assurance Monitoring (CAM)**

- (f) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to 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 - Entire Source**

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset)  
This source is located in the attainment area for all criteria pollutants; therefore, this rule does not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 326 IAC 2-6 (Emission Reporting)  
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule 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 PM Limitations Except Lake County  
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (i) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (j) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

**State Rule Applicability – Individual Facilities**

**Raw Material Receiving and Handling (RAW1), Intermediate Handling (Intermediate1) and Vacuum Receivers (Receiver2- Receiver12):**

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-2, the Particulate Emissions from each unit shall not exceed the following limits:

Emission Units	Process Weight Rate (pounds per hour )	PM Emission Limit (pounds per hour)
Raw1		
Silo S101	3125	5.53
Silo S102	3125	5.53
Silo S103	3125	5.53
Silo S104	3125	5.53
Receiver1	28,000	24.03
Intermediate1		
Surge Bin SB01	6250	8.80
Surge Bin SB01	6250	8.80
Receiver VF06	15,500	16.17
Receivers		
Receiver 2	600	1.83
Receiver 3	600	1.83
Receiver 4	1,200	2.91
Receiver 5	1,200	2.91
Receiver 6	1,200	2.91
Receiver 7	1,200	2.91
Receiver 8	1,200	2.91
Receiver 9	1,200	2.91
Receiver 10	1,200	2.91
Receiver 11	1,200	2.91
Receiver 12	3,600	6.08

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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
 P = process weight rate in tons per hour

The above units can comply with the above limits. See the detail calculations in Appendix A to the TSD for the compliance.

- (b) 326 IAC 8-1-6 (New facilities; general reduction requirements)  
 There is no VOC emissions from each unit; therefore, the 326 IAC 8-1-6 requirements do not apply.
- (c) There are no other 326 IAC 8 Rules that are applicable to these presses.

**Extruder/Injection Molding Presses Operation [Presses 31,32,33,41,42,43,51,52,53,61,62,63,71,81,82 and 83]**

- (a) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The PTE HAPs from extruder/injection molding presses operation is less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
There is no Particulate from the extruder/injection molding presses operation, therefore, this requirement is not applicable.
- (c) 326 IAC 8-1-6 (New facilities; general reduction requirements)  
The potential to emit VOC from each Press is less than 25 tons per year, therefore, the 326 IAC 8-1-6 requirements are not applicable to this operation.
- (d) There are no other 326 IAC 8 Rules that are applicable to these presses.

**Grinding (GR1) and Re grinding process (S105):**

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2, the Particulate Emissions from each unit shall not exceed the following limits

Emission Units	Process Weight Rate (pounds per hour )	PM Emission Limit (pounds per hour)
GR1	800	2.22
S105	12,500	14.0

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:

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

In order to comply with this unit, the cyclone and a baghouse for the GR-1 shall be operation at all times in order to comply with this limit and the S105 can comply with the limit. See the detail calculations in Appendix A to the TSD for the compliance.

- (b) 326 IAC 8-1-6 (New facilities; general reduction requirements)  
There are no VOC emissions from each unit; therefore, the 326 IAC 8-1-6 requirements do not apply.
- (c) There are no other 326 IAC 8 Rules that are applicable to these presses.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Filter V1, and Baghouses V2 and V3,	Visible Emissions	Daily	Normal-Abnormal	Response Steps
cyclone and/or Baghouse for Raw1, GR1 and S105	Water Pressure Drop		1.0 to 3.0 inches	

**Note:**

These monitoring conditions are necessary because the baghouses and Filter for the raw material receiving and handling facilities, identified as Raw1 and the baghouse and cyclone for the grinding operation, identified as GR1, and the baghouse for re-grinding operation, identified as S105, must operate properly to ensure compliance with the limits of 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (PSD).

**Testing**

Testing is not required for this source, since the alternative EFs have been reviewed and accepted by IDEM, OAQ for this source.

**Recommendation**

The staff recommends to the Commissioner that the New Source Review and FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 4, 2012. Additional information was received on April 23, 24, 26, 27, and July 29, 2012.

### Conclusion

The operation of this high density polyethylene structural foam production source shall be subject to the conditions of the attached New Source Review and FESOP Renewal No. F 179-31710-00024.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5615) or toll free at 1-800-451-6027 extension 4-5615.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name:** Buckhorn, Inc.  
**Address City IN Zip:** 785 S. Decker Drive, Bluffton, Indiana  
**Permit Number:** F 179-31710-00024  
**Reviewer:** Renee Traivaranon  
**Date:** August 27, 2012

Potential Emissions (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Combine HAPs	Single HAP
Raw1	70.96	70.96	70.96	-	-	-	-	-	-	-
Intermediate1	49.06	49.06	49.06	-	-	-	-	-	-	-
Vacuum Receivers (#2 - #12)	25.23	25.23	25.23	-	-	-	-	-	-	-
Sixteen (16) Molding Presses	-	-	-	-	-	37.89	-	-	3.79	3.79
Grinding (GR1)	169.07	169.07	169.07	-	-	-	-	-	-	-
Re-Grinding (S105)	41.06	41.06	41.06	-	-	-	-	-	-	-
Combustion	0.04	0.16	0.16	0.01	2.08	0.11	1.75	2511.79	0.04	0.037
<b>Total</b>	<b>355.41</b>	<b>355.53</b>	<b>355.53</b>	<b>0.01</b>	<b>2.08</b>	<b>38.00</b>	<b>1.75</b>	<b>2511.79</b>	<b>3.83</b>	<b>3.79</b>

(Acetaldehyde)

(Hexane)

(Acetaldehyde)

Potential Emissions After Issuance (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Combine HAPs	Single HAP
Raw1	70.96	44.63	44.63	-	-	-	-	-	-	-
Intermediate1	49.06	20.02	20.02	-	-	-	-	-	-	-
Vacuum Receivers (#2-#12)	25.23	23.09	23.09	-	-	-	-	-	-	-
Sixteen (16) Molding Presses	-	-	-	-	-	37.89	-	-	3.79	3.79
Grinding (GR1)	9.72	9.72	9.72	-	-	-	-	-	-	-
Re-Grinding (S105)	41.06	2.05	2.05	-	-	-	-	-	-	-
Combustion	0.04	0.16	0.16	0.01	2.08	0.11	1.75	2511.79	0.04	0.037
<b>Total</b>	<b>196.06</b>	<b>99.67</b>	<b>99.67</b>	<b>0.01</b>	<b>2.08</b>	<b>38.00</b>	<b>1.75</b>	<b>2,511.79</b>	<b>3.83</b>	<b>3.79</b>

(Acetaldehyde)

(Hexane)

(Acetaldehyde)

**Appendix A: Emissions Calculations**  
Storage and Handling

Company Name: Buckhorn, Inc.  
Address City IN Zip: 785 S. Decker Drive, Bluffton, Indiana  
Permit Number: F 179-31710-00024  
Reviewer: Renee Traivaranon  
Date: August 27, 2012

Facility	Capacity lbs/hr	Control Device	Control Efficiency	Emission Factor PM/PM10/PM2.5 lbs/ton	Potential to emit				Limits	
					PM/PM10/PM2.5		PM/PM10/PM2.5		FESOP	
					(Uncontrolled) lbs/hr	(Controlled) lbs/hr	(Uncontrolled) tons/yr	(Controlled) tons/yr	PM10/PM2.5 (lbs/hr)	PM10/PM2.5 (tons/yr)
Raw material receiving and handling (RAW1) Silos S101 - S102 Silos S103 - S104	6250	Baghouses	95.0%	0.8	2.5	0.13	10.95	0.55	1.57	6.88
	6250	V3	95.0%	0.8	2.5	0.13	10.95	0.55	1.57	6.88
Receiver1	28,000	Filter V1	95.0%	0.8	11.2	0.56	49.06	2.45	7.05	30.88
<b>Total</b>						<b>0.81</b>	<b>70.96</b>	<b>3.55</b>	<b>10.2</b>	<b>44.6</b>

Facility	Capacity lbs/hr	Control Device	Control Efficiency	Emission Factor PM/PM10/PM2.5 lbs/ton	Potential to emit				Limits	
					PM/PM10/PM2.5		PM/PM10/PM2.5		FESOP	
					(Uncontrolled) lbs/hr	(Controlled) lbs/hr	(Uncontrolled) tons/yr	(Controlled) tons/yr	PM10/PM2.5 (lbs/hr)	PM10/PM2.5 (tons/yr)
Intermediate material handling (Intermediate1) Surge Bins SB01 Surge Bins SB02	6,250	Baghouses	95.0%	0.8	2.50	0.13	10.95	0.55	1.02	4.47
	6,250	V5	95.0%	0.8	2.50	0.13	10.95	0.55	1.02	4.47
Pressure Receiver VF06	15,500	Filter V6	95.0%	0.8	6.20	0.31	27.16	1.36	2.53	11.08
<b>Total</b>						<b>0.56</b>	<b>49.06</b>	<b>2.45</b>	<b>4.57</b>	<b>20.02</b>

Facility	Capacity lbs/hr	Control Device	Limits 326 IAC 6-2-3(e) lbs/hr
Raw material receiving and handling (RAW1) Silo S101 Silo S102 Silo S103 Silo S103	3125	Baghouses	5.53
	3125	V2	5.53
	3125	V3	5.53
	3125	V3	5.53
Receiver1	28,000	V1 Filter	24.03
Intermediate material handling (Intermediate1) Surge Bin SB01 Surge Bin SB02	6250	Baghouses V4	8.80
	6250	V5	8.80
	15,500	V6 Filter	16.17

**Methodology**

Emissions factor from AP-42 Table 6.6.2-2, footnote f. (0.4 g PM/kg product = 0.8 lbs PM/kg product storage without control.)  
 Potential to emit of PM/PM10/PM2.5 (lbs/hr)(Uncontrolled) = PM/PM10/PM2.5 emission factor (lbs/ton)\*Capacity (lbs/hr) \* 1 ton / 2000 pounds  
 Potential to emit of PM/PM10/PM2.5 (limited) = Potential to emit of PM/PM10/PM2.5 (uncontrolled) \* (1 - control efficiency)  
 326 IAC 6-2-3(e) Allowable = 4.10(Process Weight Rate)^0.67

Note: Since the control efficiency of 95% is considered conservative, it was replaced to 99.9% in New Source Construction and FESOP No. 179-24865-00024, issued on January 9, 2008.

**Appendix A: Emissions Calculations  
Storage and Handling**

Company Name: Buckhorn, Inc.  
Address City IN Zip: 785 S. Decker Drive, Bluffton, Indiana  
Permit Number: F 179-31710-00024  
Reviewer: Renee Traivaranon  
Date: August 27, 2012

Facility	Capacity lbs/hr	Control Device*	Control Efficiency	Emission Factor PM/PM10/PM2.5 lbs/ton	Potential to emit				Limits	
					PM/PM10/PM2.5		PM/PM10/PM2.5		FESOP	
					(Uncontrolled) lbs/hr	(Controlled) lbs/hr	(Uncontrolled) tons/yr	(Controlled) tons/yr	PM10/PM2.5 (lbs/hr)	PM10/PM2.5 (tons/yr)
Receiver2	600	Filter	95.0%	0.8	0.240	0.0120	1.05	0.05	0.220	0.964
Receiver3	600			0.8	0.240	0.0120	1.05	0.05	0.220	0.964
Receiver4	1200	Filter		0.8	0.480	0.0240	2.10	0.11	0.439	1.923
Receiver5	1200			0.8	0.480	0.0240	2.10	0.11	0.439	1.923
Receiver6	1200	Filter		0.8	0.480	0.0240	2.10	0.11	0.439	1.923
Receiver7	1200			0.8	0.480	0.0240	2.10	0.11	0.439	1.923
Receiver8	1200	Filter		0.8	0.480	0.0240	2.10	0.11	0.439	1.923
Receiver9	1200			0.8	0.480	0.0240	2.10	0.11	0.439	1.923
Receiver10	1200	Filter		0.8	0.480	0.0240	2.10	0.11	0.439	1.923
Receiver11	1200			0.8	0.480	0.0240	2.10	0.11	0.439	1.923
Receiver12	3600	Filter		0.8	1.44	0.0720	6.31	0.32	1.32	5.78
<b>Totals</b>				<b>5.8</b>	<b>0.29</b>	<b>25.2</b>	<b>1.3</b>	<b>5.3</b>	<b>23.1</b>	

Facility	Capacity lbs/hr	Control Device*	Limits 326 IAC 6-2-3(e) lbs/hr
Receiver2	600	Filter	1.83
Receiver3	600		1.83
Receiver4	1200	Filter	2.91
Receiver5	1200		2.91
Receiver6	1200	Filter	2.91
Receiver7	1200		2.91
Receiver8	1200	Filter	2.91
Receiver9	1200		2.91
Receiver10	1200	Filter	2.91
Receiver11	1200		2.91
Receiver12	3600	Filter	6.08

**Methodology**

Emissions factor from AP-42 Table 6.6.2-2, footnote f. (0.4 g PM/kg product = 0.8 lbs PM/kg product storage without control.)  
 Potential to emit of PM/PM10/PM2.5 (lbs/hr)(Uncontrolled) = PM/PM10/PM2.5 emission factor (lbs/ton)\*Capacity (lbs/hr) \* 1 ton / 2000 pounds  
 Potential to emit of PM/PM10/PM2.5 (limited) = Potential to emit of PM/PM10/PM2.5 (uncontrolled) \* (1 - control efficiency)\*10  
 326 IAC 6-2-3(e) Allowable = 4.10(Process Weight Rate)^0.67

Note: The control efficiency of 95% is considered conservative, therefore, it was replaced 99.9% in New Source Construction and FESOP No. 179-24865-00024, issued on January 9, 2008.  
 Also, each two receivers are controlled by one filter.

**Appendix A: Emissions Calculations  
Molding Operations**

**Company Name: Buckhorn, Inc.  
Address City IN Zip: 785 S. Decker Drive, Bluffton, Indiana  
Permit Number: F 179-31710-00024  
Reviewer: Renee Traivaranon  
Date: August 27, 2012**

Unit	Capacity	Emission Factor		Potential to Emit	
		VOC lbs/ton	HAPs lbs/ton	VOC tons/year	HAPs (Acetaldehyde) tons/year
Press 31	500	1.00	0.100	1.10	0.110
Press 32	500	1.00	0.100	1.10	0.110
Press 51	500	1.00	0.100	1.10	0.110
Press 52	500	1.00	0.100	1.10	0.110
Press 41	500	1.00	0.100	1.10	0.110
Press 42	500	1.00	0.100	1.10	0.110
Press 61	2400	1.00	0.100	5.26	0.526
Press 62	2400	1.00	0.100	5.26	0.526
Press 71	500	1.00	0.100	1.10	0.110
Press 53	2400	1.00	0.100	5.26	0.526
Press 81	300	1.00	0.100	0.66	0.066
Press 82	200	1.00	0.100	0.44	0.044
Press 33	1000	1.00	0.100	2.19	0.219
Press 43	2400	1.00	0.100	5.26	0.526
Press 83	300	1.00	0.100	0.66	0.066
Press 63	2400	1.00	0.100	5.26	0.526

<b>Totals</b>	<b>37.9</b>	<b>3.79</b>
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Note:

Presses 16 and 17 are added and press 15 is removed during this renewal period.

**Methodology**

Potential to emit (tons/yr) = Emission Factor (lbs/ton) \* (Capacity (lbs/hr) / 2000 (lbs/ton)) \* 8760 (hr/yr) / 2000 (lbs/ton)  
Emission factors for Polyethylene processing were developed by Wisconsin Department of Natural Resources, based on stack testing of polyethylene manufacturing sources as issued in New Source Construction and FESOP No. 179-24865-00024, issued on January 9, 2008.

**Appendix A: Emissions Calculations  
Grinding Operations**

**Company Name: Buckhorn, Inc.  
Address City IN Zip: 785 S. Decker Drive, Bluffton, Indiana  
Permit Number: F 179-31710-00024  
Reviewer: Renee Traivaranon  
Date: August 27, 2012**

Facility	Intermediate 1 (lbs/hr)	Control Device	Control Efficiency	Potential to emit			
				(Uncontrolled)		(Controlled)	
				PM/PM10/PM2.5		PM/PM10/PM2.5	
				(lbs/hr)	(tons/year)	(lbs/hr)	(tons/year)
Grinding (GR1)	800	Cyclone	55.0%	38.6	169	0.869	3.804
		Baghouse	95.0%				

**326 IAC 6-3-2 Allowable Rate of Emissions**

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Limits	
		326 IAC 6-3-2 (lbs/hr)	FESOP (tons/yr)
800	0.400	2.22	9.72

**Methodology**

Potential to emit of PM/PM10/PM2.5 (Uncontrolled) (tons/yr) = (amount collected per hour \* 8760) / (control efficiency)  
 Potential to emit of PM/PM10/PM2.5 (Controlled) (tons/yr) = Potential to emit of PM/PM10/PM2.5 (uncontrolled) \* (1 - control efficiency)

326 IAC 6-3-2(e) limited emissions:  
 $E = 4.10 P^{0.67}$  Where E = rate of emissions in lbs/hr and P = maximum process weight rate in tons/hr

Note: PTE is as issued in New Source Construction and FESOP No. 179-24865-00024, issued on January 9, 2008, except control efficiency  
 The control efficiency of 95% is considered conservative, therefore, it was replaced 99.9% in FESOP No. 179-24865-00024, issued on January 9, 2008.

**Appendix A: Emissions Calculations  
Grinding Operations**

**Company Name:** Buckhorn, Inc.  
**Address City IN Zip:** 785 S. Decker Drive, Bluffton, Indiana  
**Permit Number:** F 179-31710-00024  
**Reviewer:** Renee Traivaranon  
**Date:** August 27, 2012

Facility	Intermediate 1 (tons/hr)	Emission Factor (lb/ton)	Control Efficiency (%)	Potential to emit				FESOP	
				(Uncontrolled)		(Controlled)		Limit	
				PM/PM10/PM2.5		PM/PM10/PM2.5		PM10/PM2.5	
				(lbs/hr)	(tons/year)	(lbs/hr)	(tons/year)	(lbs/hr)	tons/yr
Re-Grinding (S105)	6.25	1.5	95.0%	9.4	41.1	0.47	2.1	0.47	2.05

**326 IAC 6-3-2 Allowable Rate of Emissions**

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Limit 326 IAC 6-3-2 (lbs/hr)
12500	6.25	14.0

**Methodology**

Assumption PM=PM10=PM2.5

Emission Factor from AP42, grinder (SCC 3-05-0190-2) Table 11.21-4 (1-95).

This emission factor is considered alternative emission factor, however, IDEM has reviewed this ef and it is considered conservative, therefore, testing will not be required for this unit

Potential Emissions of PM/PM10/PM2.5 (lb/hr) = Maximum Capacity (ton/hr)\*EF (lb/ton)

Potential to emit of PM/PM10/PM2.5 (Controlled) (tons/yr) = Potential to emit of PM/PM10/PM2.5 (uncontrolled) \* (1 - control efficiency)

326 IAC 6-3-2(e) limited emissions:

$E = 4.10 P^{0.67}$  Where E = rate of emissions in lbs/hr and P = maximum process weight rate in tons/hr

Note: This source is allowed for 95% of uncontrolled PTE to comply with FESOP.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

**Company Name:** Buckhorn, Inc.  
**Address City IN Zip:** 785 S. Decker Drive, Bluffton, Indiana  
**Permit Number:** F 179-31710-00024  
**Reviewer:** Renee Traivaranon  
**Date:** August 27, 2012

Heat Input Capacity                      HHV                      Potential Throughput  
MMBtu/hr                                       $\frac{\text{mmBtu}}{\text{mmscf}}$                       MMCF/yr  
Intermediate 1

4.8	1000	41.6
-----	------	------

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC
Potential Emission in tons/yr	0.04	0.2	0.2	0.0	2.1	0.1

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

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
HAPs Emissions**

**Company Name:** Buckhorn, Inc.  
**Address City IN Zip:** 785 S. Decker Drive, Bluffton, Indiana  
**Permit Number:** F 179-31710-00024  
**Reviewer:** Renee Traivaranon  
**Date:** August 27, 2012

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.369E-05	2.497E-05	1.560E-03	3.745E-02	7.074E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.040E-05	2.289E-05	2.913E-05	7.906E-06	4.369E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

See next page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Greenhouse Gas Emissions**

**Company Name:** Buckhorn, Inc.  
**Address City IN Zip:** 785 S. Decker Drive, Bluffton, Indiana  
**Permit Number:** F 179-31710-00024  
**Reviewer:** Renee Traivaranon  
**Date:** August 27, 2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,497	0.0	0.0
Summed Potential Emissions in tons/yr		2,496.69	
CO2e Total in tons/yr		2,511.79	

**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).



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

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

**TO:** Richard Singer  
Buckhorn, Inc.  
785 S Decker Drive  
Bluffton, IN 46714

**DATE:** August 27, 2012

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

**SUBJECT:** Final Decision  
FESOP  
179-31710-00024

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:  
Jason Morrison, Consultant  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Wells County Public Library

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

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

**Applicant Name: Buckhorn Inc.**  
**Permit Number: 179-31710-00024**

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	DPABST 8/27/2012 Buckhorn, Inc. 179-31710-00024 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Richard Singer Buckhorn, Inc. 785 S Decker Dr Bluffton IN 46714 (Source CAATS) (CONFIRM DELIVERY)										
2		Richard Singer Plant Mgr Buckhorn, Inc. 785 S Decker Dr Bluffton IN 46714 (RO CAATS)										
3		Wells County Health Department 223 W. Washington St Bluffton IN 46714-1955 (Health Department)										
4		Wells County Public Library 200 W. Washington St Bluffton IN 46714-1999 (Library)										
5		Ms. Joy Haney 5285 East 400 South Columbia City IN 46725 (Affected Party)										
6		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
7		Mrs. Tera Fredrickson 4860 W 900 S--90 Montpelier IN 47359-9559 (Affected Party)										
8		Mr. Christina Furnish 7539 W 1100 S--90 Montpelier IN 47359 (Affected Party)										
9		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 (Affected Party)										
10		Mr. Kevin E. Jackson 7858 South 450 West Poneto IN 46781 (Affected Party)										
11		Mr. Neil Potter Southern Wells Community Schools 9120 S 300 W Poneto IN 46781 (Affected Party)										
12		Mrs. Donna Runkle 7327 W 1000 S--90 Warren IN 46792 (Affected Party)										
13		Wells County Board of Commissioners 105 W Market Street, Suite 205, Courthouse Bluffton IN 46714 (Local Official)										
14		Mr. Jason Morrison Concentra Environmental Health and Safety Services 10339 Dawsons Creek Blvd suite 7E Fort Wayne IN 46825 (Consultant)										
15												

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