



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for **Sun Polymers International, Inc.** in **Morgan County**

Permit No. M 109-31777-00036

The Indiana Department of Environmental Management (IDEM) has received an application from Sun Polymers International, Inc. located at 100 Sun Polymers Drive, Mooresville, IN 46158 for a new source review and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Sun Polymers International, Inc. to make certain changes at its existing source. Sun Polymers International, Inc. has applied to add two saturated polyester resin production units, one conveyance, storage, bagging line, and their control devices to the source.

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

Morgan County Public Library
110 South Jefferson Street
Martinsville, IN 46151

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number **M 109-31777-00036** in all correspondence.

Comments should be sent to:

Ms. Renee Traivaranon
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5615
Or dial directly: (317) 234-5615
Fax: (317)-232-6749 attn: Renee Traivaranon
E-mail: Rtraivar@idem.in.gov

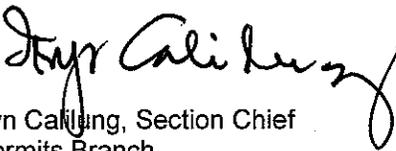
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

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

What will happen after IDEM makes a decision?

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

If you have any questions please contact Ms. Renee Traivaranon or my staff at the above address.


Iryn Callung, Section Chief
Permits Branch
Office of Air Quality

RT



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Indianapolis, Indiana 46204
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DRAFT

**New Source Review and Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**Sun Polymeres International, Inc.
100 Sun Polymeres Drive
 Mooresville, Indiana 46158**

(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.

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

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

Operation Permit No.: M 109-31777-00036	
Issued by:	Issuance Date:
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source that manufactures automotive parts, out of sintered powder, for engines, transmissions and shock absorbers.

Source Address:	100 Sun Polymers Drive, Mooresville, Indiana 46158
General Source Phone Number:	(317) 834-6410
SIC Code:	2821 (Plastics Materials, Synthetic Resins, and Nonvulcanizable Elastomers)
County Location:	Morgan
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Resin Production Units:

- (1) Two (2) enclosed identical saturated polyester resin production units, identified as resin reactors R-1 and R-2, constructed in 1998, each with a maximum throughput of 55,500 lbs of resin per batch and 52 hours per batch, equipped with a baghouse, DC-1, to control particulates, exhausting inside.
- (2) One (1) enclosed saturated polyester resin production unit, identified as resin reactor R-3, constructed in 2010, with a maximum throughput of 55,500 lbs of resin per batch and 52 hours per batch, equipped with a baghouse, DC-1, to control particulates, exhausting inside.
- (3) Two (2) enclosed identical saturated polyester resin production units, identified as resin reactors R-4 and R-5, approved for construction in 2012, each with a maximum throughput of 55,500 lbs of resin per batch and 52 hours per batch, equipped with a baghouse, DC-1, to control particulates, exhausting inside.

Each batch consists of pumping the material into the reactor, heating and reaction time for the material, cooling operation in the reactor and silo transfer.

- (4) One (1) cooling, silo conveying, storage and bagging line, identified as CCSB-1, constructed in 1999, processing 3,375 lbs/hr of resin material, equipped with a baghouse, DC-2, to control particulates, exhausting inside.

- (5) One (1) cooling, silo conveying, storage and bagging line, identified as CCSB-2, approved for construction in 2012, processing 3,375 lbs/hr of resin material, equipped with a baghouse, DC-3, to control particulates, exhausting inside.
- (b) Combustion Units:
- (1) One (1) natural gas-fired thermal fluid heating boiler/heater, identified as C1, constructed in 1998, maximum heat input of 8.0 million BTU/hr, exhausting to stack S1.
 - (2) One (1) natural gas-fired steam boiler, identified as C2, constructed in 2010, maximum heat input capacity of 0.78 million BTU/hr exhausting to stack S5.
 - (3) One (1) natural gas-fired space heater furnace, identified as C3, constructed in 1998, with a maximum heat input capacity of 0.80 million BTU/hr, exhausting to stack S3.
 - (4) Eight (8) natural gas-fired space heaters, collectively identified as C4, constructed in 1998, with a maximum capacity 0.085 MMBtu/hr each, exhausting general ventilation.
 - (5) One (1) natural gas-fired thermal fluid heater, identified as C5, approved for construction in 2012, with maximum heat input of 8.0 million BTU/hr.
- (c) Four (4) above ground storage tanks (AST), constructed in 1998 through 2000 and approved for modification in 2012 to store raw materials and waste products as listed below:
- (1) One (1) fiberglass tank, maximum capacity 5,000 gallons, storing distillate with mix, identified as T-1, installed in 2000.
 - (2) One (1) steel tank, maximum capacity 27,000 gallons, storing ethylene glycol, identified as T-2, installed in 1999.
 - (3) One (1) steel tank, maximum capacity 27,000 gallons, storing wastewater, identified as T-3, installed in 1999.
 - (4) One (1) steel tank, maximum capacity 81,000 gallons, storing neopentyl glycol, identified as T-4, installed in 1999.

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

- (a) This permit, M 109-31777-00036, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M 109-31777-00036 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:

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

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

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

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

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

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

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

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

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

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

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Resin Production Units:

- (1) Two (2) enclosed identical saturated polyester resin production units, identified as resin reactors R-1 and R-2, constructed in 1998, each with a maximum throughput of 55,500 lbs of resin per batch and 52 hours per batch, equipped with a baghouse, DC-1, to control particulates, exhausting inside.
- (2) One (1) enclosed saturated polyester resin production unit, identified as resin reactor R-3, constructed in 2010, with a maximum throughput of 55,500 lbs of resin per batch and 52 hours per batch, equipped with a baghouse, DC-1, to control particulates, exhausting inside.
- (3) Two (2) enclosed identical saturated polyester resin production units, identified as resin reactors R-4 and R-5, approved for construction in 2012, each with a maximum throughput of 55,500 lbs of resin per batch and 52 hours per batch, equipped with a baghouse, DC-1, to control particulates, exhausting inside.

Each batch consists of pumping the material into the reactor, heating and reaction time for the material, cooling operation in the reactor and silo transfer.

- (4) One (1) cooling, silo conveying, storage and bagging line, identified as CCSB-1, constructed in 1999, processing 3,375 lbs/hr of resin material, equipped with a baghouse, DC-2, to control particulates, exhausting inside.
- (5) One (1) cooling, silo conveying, storage and bagging line, identified as CCSB-2, approved for construction in 2012, processing 3,375 lbs/hr of resin material, equipped with a baghouse, DC-3, to control particulates exhausting inside.

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

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

D.1.1 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from each of the saturated polyester resin production units, R-1, R-2, R-3, R-4 and R-5 shall not exceed 37.99 pounds per hour, when operating at a process weight rates up to 27.75 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the resin cooling, conveying, silo storage and bagging line, CCSB-1 and CCSB-2, each shall not exceed 5.82 pounds per hour, when operating at a process weight rate of 3,375 pounds per hour.

The pound per hour limitation for (a) and (b) was calculated with the following equation:

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

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

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

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

A Preventive Maintenance Plan is required for these facilities and 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.1.3 Particulate Control

In order to comply with Condition D.1.1, the baghouses; DC-1, DC-2 and DC-3, for particulate control shall be in operation and control emissions from the R-1 through R-5, and CCSB-1 and CCSB-2, at all times when the associated process is in operation.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) Combustion Units:

- (1) One (1) natural gas-fired thermal fluid heating boiler/heater, identified as C1, constructed in 1998, maximum heat input of 8.0 million BTU/hr, exhausting to stack S1.
- (2) One (1) natural gas-fired steam boiler, identified as C2, constructed in 2010, maximum heat input capacity of 0.78 million BTU/hr exhausting to stack S5.
- (3) One (1) natural gas-fired space heater furnace, identified as C3, constructed in 1998, with a maximum heat input capacity of 0.80 million BTU/hr, exhausting to stack S3.
- (4) Eight (8) natural gas-fired space heaters, collectively identified as C4, constructed in 1998, with a maximum capacity 0.085 MMBtu/hr each, exhausting general ventilation.
- (5) One (1) natural gas-fired thermal fluid heater, identified as C5, approved for construction in 2012, with maximum heat input of 8.0 million BTU/hr.

(c) Four (4) above ground storage tanks (AST), constructed in 1998 through 2000 and approved for modification in 2012 to store raw materials and waste products as listed below:

- (1) One (1) fiberglass tank, maximum capacity 5,000 gallons, storing distillate with mix, identified as T-1, installed in 2000.
- (2) One (1) steel tank, maximum capacity 27,000 gallons, storing ethylene glycol, identified as T-2, installed in 1999.
- (3) One (1) steel tank, maximum capacity 27,000 gallons, storing wastewater, identified as T-3, installed in 1999.
- (4) One (1) steel tank, maximum capacity 81,000 gallons, storing neopentyl glycol, identified as T-4, installed in 1999.

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

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

D.2.1 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from each natural gas-fired boiler, C1 and C2, shall not exceed the 0.6 pounds per million British thermal unit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Sun Polymeres International, Inc.
Address:	100 Sun Polymers Drive
City:	Mooreville, Indiana 46158
Phone #:	(317) 834-6410
MSOP #:	M 109-31777-00036

I hereby certify that Sun Polymeres International, Inc. is: still in operation.
 no longer in operation.

I hereby certify that Sun Polymeres International, Inc. is: in compliance with the requirements of M 109-31777-00036.
 not in compliance with the requirements of M 109-31777-00036.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Sun Polymers International, Inc.
100 Sun Polymers Drive
Mooresville, Indiana 46158

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Sun Polymers International, Inc. located at 100 Sun Polymers Drive, Mooresville, Indiana 46158, completed construction the emissions units on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 25, 2012 and as permitted pursuant to New Source Review and Minor Source Operating Permit No. M 109-31777-00036, Plant ID No. 109-00036 issued on _____.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

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

Technical Support Document (TSD) for a Registration Transitioning to
Minor Source Operating Permit (MSOP) (with New Source Review (NSR))

Source Description and Location

Source Name: Sun Polymers International, Inc.
Source Location: 100 Sun Polymers Drive, Mooresville, IN 46158
County: Morgan
SIC Code: 2821 (Plastics Materials, Synthetic Resins, and Nonvulcanizable Elastomers)
Operation Permit No.: M 109-31777-00036
Permit Reviewer: Renee Traivaranon

On April 25, 2012, the Office of Air Quality (OAQ) received an application from Sun Polymers International, Inc. related to the construction and operation of new emission units at an existing source and transition from a registration to a MSOP. This source is a stationary source that manufactures automotive parts, out of sintered powder, for engines, transmissions and shock absorbers.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration Notice-Only Change No. 109-30121-00036, issued on February 2, 2011;
- (b) Registration Notice-Only Change No. 109-29936-00036, issued on December 22, 2010;
- (c) Registration Revision 109-14794-00036, issued on October 4, 2001; and
- (d) Registration 109-9952-00036, issued on October 1, 1998

Due to this application, the source is transitioning from a registration to a MSOP.

County Attainment Status

The source is located in Morgan County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality

Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Morgan County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Sun Polymers International, Inc. on April 25, 2012, relating to the addition of two (2) saturated polyester resin production units, one (1) conveyance, storage and a bagging line. Due to the addition of these units, the source is transitioning from registration to a MSOP.

The source consists of the following permitted and new emission units:

[Note: New emissions units and/or description are shown in bold text, and the removed units have been shown as ~~strikeouts~~.]

(a) **Resin Production Units:**

- (1) Two (2) enclosed identical saturated polyester resin production units, identified as resin reactors R-1 and R-2, constructed in 1998, each with a maximum throughput of 55,500 lbs of resin **per batch and 52 hours per batch**, equipped with a ~~cyclone dust collector~~ **baghouse**, DC-1, to control particulates, exhausting inside.
- (2) One (1) enclosed saturated polyester resin production unit, identified as resin reactor R-3, constructed in 2010, ~~each~~ with a maximum throughput of 55,500 lbs of resin **per batch and 52 hours per batch**, equipped with a ~~cyclone dust collector~~ **baghouse**, DC-1, to control particulates, exhausting inside.

[Note: The description has been revised to correct the particulate control and indicate the number of hours per batch.]

- (3) **Two (2) enclosed identical saturated polyester resin production units, identified as resin reactors R-4 and R-5, approved for construction in 2012, each with a maximum throughput of 55,500 lbs of resin per batch and 52 hours per batch, equipped with a baghouse, DC-1, to control particulates, exhausting inside.**

[Note: the baghouse, DC-1, is a common control to all five (5) reactors; R-1 through R-5, when moving materials from the hood to each reactor.]

Each batch consists of pumping the material into the reactor, heating and reaction time for the material, cooling operation in the reactor and silo transfer.

- (4) One (1) **cooling, silo conveying, storage and bagging line, identified as CCSB-1, constructed in 1999**, processing 3,375 lbs/hr of resin material, equipped with a **baghouse cyclone dust collector, DC-2**, to control particulates, exhausting inside.

[Note: There are no physical changes to CCSB-1, the description has been revised to correct the particulate control and indicate the date of construction.]

- (5) **One (1) cooling, silo conveying, storage and bagging line, identified as CCSB-2, approved for construction in 2012, processing 3,375 lbs/hr of resin material, equipped with a baghouse, DC-3, to control particulates exhausting inside.**

(b) Combustion Units:

- (1) One (1) natural gas-fired thermal fluid heating boiler/heater, identified as C1, constructed in 1998, maximum heat input of 8.0 million BTU/hr, exhausting to stack S1.
- (2) One (1) natural gas-fired steam boiler, identified as C2, constructed in 2010, maximum heat input capacity of 0.78 million BTU/hr exhausting to stack S5.
- (3) One (1) natural gas-fired space heater furnace, identified as C3, constructed in 1998, with a maximum heat input capacity of 0.80 million BTU/hr, exhausting to stack S3.
- (4) Eight (8) natural gas-fired space heaters, collectively identified as C4, constructed in 1998, with a maximum capacity 0.085 MMBtu/hr each, exhausting general ventilation.
- (5) **One (1) natural gas-fired thermal fluid heater, identified as C5, approved for construction in 2012, with maximum heat input of 8.0 million BTU/hr.**

(c) ~~Five (5)~~ **Four (4)** above ground storage tanks (AST), constructed in 1998 through 2000 and approved for modification in 2012 to store raw materials and waste products as listed below:

- (1) One (1) fiberglass tank, maximum capacity 5,000 gallons, storing distillate with mix, identified as T-1, **installed in 2000**.
- (2) One (1) steel tank, maximum capacity 27,000 gallons, storing ethylene glycol, identified as T-2, **installed in 1999**.
- (3) One (1) steel tank, maximum capacity 27,000 gallons, storing wastewater, identified as T-3 **installed in 1999**.

(Note: The content of T-3 has been changed from diethylene glycol to wastewater during this review.)

- (4) One (1) steel tank, maximum capacity 81,000 gallons, storing neopentyl glycol, identified as T-4 **installed in 1999**.

- ~~(5) One (1) steel tank, maximum capacity 10,000 gallons, storing waste water, identified as T-5.~~

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units during this review.

Emission Units and Pollution Control Equipment Removed from the Source

One (1) steel tank, maximum capacity 10,000 gallons, storing waste water, identified as T5.

Enforcement Issues

There are no pending enforcement actions related to this application.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	7.39
PM10 ⁽¹⁾	7.85
PM2.5	7.85
SO ₂	0.05
NO _x	8.00
VOC	28.70
CO	6.72
Single HAP	0.14 (Hexane)
Total HAPs	0.2
GHGs as CO ₂ e	9,655.9

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

Criteria Pollutants (PM10, PM2.5, SO2, NOx, VOC, and CO)

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

Hazardous Air Pollutants

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Greenhouse gases (GHGs) as CO₂e

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the boilers, although each boiler is commenced after June 9, 1989, the maximum heat input capacity of each boiler is less than 10 Btu/hr.
- (b) The requirements of the New Source Performance Standard for Standards of Performance for Storage Vessels, 40 CFR 60, Subpart K, for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, are not included in this permit, since all tanks were constructed after 1978.
- (c) The requirements of the New Source Performance Standard for Standards of Performance for Storage Vessels, 40 CFR 60, Subpart Ka, for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, are not included in this permit, since all tanks were constructed after 1984.
- (d) The requirements of the New Source Performance Standard for Standards of Performance for Storage Vessels, 40 CFR 60, Subpart Kb, for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, apply to each storage vessel with a capacity greater than or equal to 75 cubic meters (m³), but they do not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa. Therefore, these requirements do not apply to tanks at this source for the following reasons:
- (1) These requirements do not apply to tank T-1, although this tank constructed after 1984, but it has a capacity less than 75 cubic meters (m³) (19,813 gallons).
- (2) These requirements do not apply to tanks T-2 and T-3 (27,000 gallons), although each tank has a capacity greater than or equal to 75 m³ but less than 151 m³ (39,890 gallons), each tank stored a liquid with a maximum true vapor pressure less than 15.0 kPa.
- (3) These requirements do not apply to tank, T-4, although this tank has a capacity greater than 151 m³, it stored a liquid with a maximum true vapor pressure less than 3.5 kPa.
- (e) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (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 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.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is subject to the requirements of 326 IAC 6-5, since this source has potential fugitive particulate emissions less than 25 tons per year.
- (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.

Resin Production Operation (R-1 through R-5)

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each resin production unit shall not exceed 37.99 pounds per hour when operating at a process weight rate of 27.75 tons per hour.

The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, the source can comply with this unit. (See Appendix A calculation attached to TSD.) Since the control's specifications are used to determine the potential to emit of the source, therefore, DC-1 will be required to operate.

- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from the each resin production is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (c) 326 IAC 8
There are no other 326 IAC 8 Rules that are applicable to this operation.

Cooling, Silo Conveying, Storage and Bagging Operation (CCSB-1 and CCSB-2)

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the resin cooling, conveying, silo storage and bagging line, CCSB-1 and CCSB-2, each, shall not exceed 5.82 lbs/hr, when operating at a process weight rate of 1.6875 tons/hr.

The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, the source can comply with this unit. (See Appendix A calculation attached to TSD.) Since, the alternative emission factors were used to determine the potential to emit of the source, DC-2 and DC-3 will be required to operate.

- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from this operation is negligible, therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (c) 326 IAC 8
There are no other 326 IAC 8 Rules that are applicable to this operation.

Combustion Units (C1 and C2)

- (a) 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the each natural gas-fired boilers, C1 and C2, rated at 8 and 0.78 MMBtu/hr, each constructed after September 21, 1983, shall not exceed the 0.6 pounds per million British thermal unit.

Note: the limit requirement has been changed since the source has removed one boiler, 5 MMBtu from the source in one of the registration notice-only change. Therefore, the total capacity of the boilers currently is less than 10 MMBtu/hr.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Frequency
resin production (R-1 thru R-5)/Baghouse DC-1	At all times, while the materials are transferring to each reactor.
cooling, silo conveying, storage and bagging line (CCSB-1) Baghouse/DC-2	At all times, while the process, CCSB-1, is in operation.
cooling, silo conveying, storage and bagging line (CCSB-2) Baghouse/DC-3	At all times, while the process, CCSB-2, is in operation.

The alternative emission factors and the control's specifications were used to determine the potential to emit of the emission units; therefore, the control devices are required to operate.

- (b) Testing is not required for this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application and additional information for the purposes of this review were received on April 4, 2012, and June 7, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Review and MSOP No. 109-31777-00036. The staff recommends to the Commissioner that this New Source Review and MSOP be approved.

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.in.gov/idem

**Appendix A: Emissions Calculations
Emission Summary**

Company Name: Sun Polymers International Inc.
Address City IN Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
Permit Number: M 109-31777-00036
Reviewer: Renee Traivaranon
Date: May 24, 2012

Potential Emissions (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Single HAP	Combined HAPs
Resin production (R1-R5)	3.25	3.25	3.25	-	-	28.05	-	-	-	-
Conveyance, storage, and bagging (CCSB1-CCSB2)	3.99	3.99	3.99	-	-	-	-	-	-	-
Combustion units (C1-C5)	0.15	0.61	0.61	0.05	8.00	0.44	6.72	9,655.86	0.14	0.15
Storage tanks (T1-T4)	-	-	-	-	-	0.21	-	-	-	-
Total	7.39	7.85	7.85	0.05	8.00	28.70	6.72	9,655.86	0.14	0.15

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**Emissions Calculations
Saturated Polyester Resin Production Emissions**

**Company Name: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 2012**

VOC Emissions Resin Production:

Material used per reactor:
18,000 lb/batch = Neopentylglycol (including up to 3,000 lb ethylene glycol and diethylene glycol in 15% of batches)
33,000 lb/batch = Terephthalic Acid
4,500 lb/batch = Isophthalic Acid
Total = 18000+33000+4500 = 55,500 lb/batch

Potential to Emit (PTE) of Volatile Organic Compounds (VOCs)

Emission Unit/Identifications	Total units	Maximum Throughput (lbs/batch)*	Maximum Throughput (tons/batch)	Processing Time (hrs/batch)	VOC Emission Factor (lbs/ton)*	PTE VOCs (lbs/batch)	Each PTE VOCs unit (tons/year)	Total PTE VOC All 5 units (tons/year)
Reactor: R1, R2, R3, R4, R5	5	55,500.0	27.8	52.0	2.4	66.60	5.61	28.05

Methodology:

*This VOC Emission Factor is from Revised registration No. 109-14794-00036 issued on 10/4/2001 for R1 and R2, and NOC registration No. 109-29936-00036 issued on 12/22/2010 for R3 .

Potential to emit (tons/yr) for each unit = Emission Factor (lbs/ton) * (Capacity (lbs/hr) / 2000 (lbs/ton)) * 8760 (hr/yr) / 2000 (lbs/ton)
Potential to emit (tons/yr) for five units = 5* Potential to emit (tons/yr) for each unit

Particulate Emissions Resin Production from DC-1:

PM/PM10/PM2.5 Emission Factor for Resin Production (addition of dry materials to reactors with materials transfer):

Potential to Emit (PTE) of PM for DC-1*

Emission Unit/Identifications	Total units	Air flow Rate (acfm)	Grain Loading (gr/acfm)	Control Efficiency (%)	Uncontrolled PTE of PM (lbs/hour)	Total ** Each Unit Uncontrolled PTE PM/PM10/PM2.5 (tons/yr)	Total** Five units Uncontrolled PTE PM/PM10/PM2.5 (tons/yr)
Reactor: R1, R2, R3, R4, R5	5	3,000.0	0.03	90.0%	7.71	0.65	3.25

Methodology:

* the hood and pipe of the bagouse, DC-1, is moved to each reactor during the material transferring.

**This PM Emission Factor is from Revised registration No. 109-14794-00036 issued on 10/4/2001 for R1 and R2, and NOC registration No. 109-29936-00036 issued on 12/22/2010 for R3 .

** The full batch cycle (52 hrs/batch) -consists of pumping the material into the reactor + heating and reaction time for the solid material + and partly cooling operation in the reactor and transfer to silo.

Each batch takes 52 hrs to complete, therefore, the PTE for the year has been correct for number of batch to assume that each batch takes 1 hr to transfer.
The number of batches per year = 8760/52 = 168.46 batches/yr or 168.46 hours/year .

Assumption PM=PM10=PM2.5

UnControlled PTE of PM/PM10/PM2.5 (lbs/hr) = (Outlet grain Loading (0.03 grains/cf) * Exhaust Flow Rate (3000 acfm) * 1 lb/7,000 grains * 60 min/hr)/(1-Controlled efficiency)

Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) for each unit = (Uncontrolled PTE of PM/PM10 (lbs/hr)*168.46 hours/year)/2000 lb/ton

Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) for each unit = 5 * Uncontrolled PTE of PM/PM10 (tons/year) for each unit

**Emissions Calculations
Saturated Polyester Resin
Silo Conveying and Bagging Emissions**

Company Name: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 2012

Silo conveyance, storage and bagging

Uncontrolled Emissions							
Emission Unit/Identifications	Capacity (lbs/hr)	Emission Factor (lbs/hr)		Emissions (lbs/hr)		Emissions (tons/yr)	
		Resin	PM	PM10/PM2.5	PM	PM10/PM2.5	PM
Silo conveying, storage and bagging (CCSB1)	3,375.0	0.27	0.27	0.46	0.46	2.0	2.0
Silo conveying, storage and bagging (CCSB2)	3,375.0	0.27	0.27	0.46	0.46	2.0	2.0
Total:						4.0	4.0

NOTES:

Saturated polyester resin from reactors, R-1 through R-5 piped into CCSB-1 and CCSB-2, where resin is cooled, crushed, stored in silo and bagged. The maximum capacity of the silo system is based on the receiving processed resin, cooling, storage and lifting in silos and packaging in the bags. This PM Emission Factor is from Revised registration No. 109-14794-00036 issued on 10/4/2001 for CCSB1, it is for silo conveying, storage and bagging.

Methodology:

PM/PM10 Emissions (lbs/hr) = PM/PM10 EF (lbs/ton) * throughput (tons/hour)
PM/PM10 Emissions (tons/yr) = PM/PM10 EF (lbs/ton) * throughput (tons/hour) * 8760 hrs/yr * 1 ton/2000 lbs
There are no emission factor for PM2.5 in AP-42, therefore, PM2.5 = PM10

**Appendix A: Emissions Calculations
Distillate Tank W/Mix (T-1)**

**Company Name: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 2012**

***Tank Dimensions (T-1)**

Shell Length (ft):	8.5
Diameter (ft):	10
Volume (gallons):	4,993.92
Avg. liquid height	4
Turnovers:	25.28
Net Throughput(gal/yr):	126,246.30
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

* This tank is 8.5 feet tall and when full, has a 4-inch layer of organic liquid on top of the wastewater and exposed to the air. Since the organic layer is on top and exposed to the air, the EPA Tanks data input assumes that the tank is (rather than 96% water) full of the organic liquid . The organic fraction has been analyzed by means of GC/MS and found to contain 8.0% isobutyraldehyde (IBA.)

Paint Characteristics

Shell Color/Shade:	Gray/Light
Shell Condition	Good
Roof Color/Shade	Gray/Medium
Roof Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	0
Pressure Settings (psig)	0

Meteorological Data used in Emissions Calculations: Indianapolis, Indiana (Avg Atmospheric Pressure = 14.33 psia)

Mixture/Component	Month	Daily Liquid Surface Temperature (deg F)			Liquid Bulk Temp	Vapor Pressure (psia)			Vapor Mol.	Molecular Weight	Basis for Vapor Pressure
		Avg.	Min.	Max.		Avg.	Min.	Max.			
52% as NPG & 48% as IBA	All	59.05	50.59	67.51	54.5	1.07	0.88	0	1.28	72	Option 1: VP60 = .00000 VP70 = .000003

Components	VOC Losses (lbs/year)		
	Working Loss	Breathing Loss	Total Emissions
52% as NPG & 48% as IBA	231.58	147.63	379.21

**Appendix A: Emissions Calculations
Ethylene Glycol (T-2)**

**Company Name: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 2012**

Tank Dimensions

Shell Length (ft):	18
Diameter (ft):	16
Volume (gallons):	27,072.95
Avg. liquid height	10
Turnovers:	1.813
Net Throughput(gal/yr):	49,083.26
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Light
Shell Condition	Good
Roof Color/Shade	Gray/Medium
Roof Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	0
Pressure Settings (psig)	0

Meteorological Data used in Emissions Calculations: Indianapolis, Indiana (Avg Atmospheric Pressure = 14.33 psia)

Mixture/Component	Month	Daily Liquid Surface Temperature (deg F)			Liquid Bulk Temp	Vapor Pressure (psia)			Vapor Mol.	Molecular Weight	Basis for Vapor Pressure
		Avg.	Min.	Max.		Avg.	Min.	Max.			
Ethylene Glycol	All	60	50.91	69.1	54.92	0.001	0.0008	0.001	62.1	62.1	Option 1: VP60 = .001 VP70 = .0013

Components	VOC Losses (lbs/year)		
	Working Loss	Breathing Loss	Total Emissions
Ethylene Glycol	0.07	0.49	0.56

**Appendix A: Emissions Calculations
wast water (T-3)**

**Company Name: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 2012**

Tank Dimensions (T-3)

Shell Length (ft):	18
Diameter (ft):	16
Volume (gallons):	27,072.95
Avg. liquid height	10.00
Turnovers:	3.6
Net Throughput(gal/yr):	97,462.62
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

* Waste water tank contains waste water with less than 1% dissolved organics. The mix of organic is the same as in the distillate tank: 8% isobutyraldehyde, 40 % heaviers compounds (treated as IBA) and 52 % acetyls of neopentyl glycol and IBA

Paint Characteristics

Shell Color/Shade:	Gray/Light
Shell Condition	Good
Roof Color/Shade	Gray/Medium
Roof Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	0
Pressure Settings (psig)	0

Meterological Data used in Emissions Calculations: Indianapolis, Indiana (Avg Atmospheric Pressure = 14.33 psia)

Mixture/Component	Month	Daily Liquid Surface Temperature (deg F)			Liquid Bulk Temp	Vapor Pressure (psia)			Vapor Mol.	Molecular Weight	Basis for Vapor Pressure
		Avg.	Min.	Max.		Avg.	Min.	Max.			
Waste water w/ < 1% organic	All	59.05	50.91	67.51	54.5	0.01	0.009	0.013	72	72	Option 1: VP60 = .0044 VP70 = .0044

Components	VOC Losses (lbs/year)		
	Working Loss	Breathing Loss	Total Emissions
Waste water w/ < 1% organic	17.59	6.15	23.74

**Appendix A: Emissions Calculations
Neopentyl Glycol (T-4)**

**Company Name: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 2012**

Tank Dimensions (T-4)

Shell Length (ft):	30
Diameter (ft):	22
Volume (gallons):	82,464.39
Avg. liquid height	11
Turnovers:	10.6
Net Throughput(gal/yr):	874,122.53
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Light
Shell Condition	Good
Roof Color/Shade	Gray/Light
Roof Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	0
Pressure Settings (psig)	0

Meteorological Data used in Emissions Calculations: Indianapolis, Indiana (Avg Atmospheric Pressure = 14.33 psia)

Mixture/Component	Month	Daily Liquid Surface Temperature (deg F)			Liquid Bulk Temp	Vapor Pressure (psia)			Vapor Mol. Weight	Basis for Vapor Pressure	
		Avg.	Min.	Max.		Avg.	Min.	Max.			
Neopentyl Glycol	All	59.05	50.59	67.51	54.5	0.0044	0.0044	0.004	104.17	104.17	Option 1: VP60 = .0044 VP70 = .0044

Components	VOC Losses (lbs/year)		
	Working Loss	Breathing Loss	Total Emissions
Neopentyl Glycol	9.54	14.47	24.01

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

**Company Name: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 2012**

	Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1 Thermal Fluid boiler	8		
1 Steam boiler	0.78		
1 space heater	0.80		
8 space Heaters	0.68		
1 Thermal Fluid heater	8.0		
Total	18.26	1000	160.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.2	0.6	0.6	0.0	8.0	0.4	6.7

*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: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 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	1.680E-04	9.597E-05	5.998E-03	1.440E-01	2.719E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.999E-05	8.798E-05	1.120E-04	3.039E-05	1.680E-04

Methodology is the same as previous p

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: Sun Polymers International Inc.
Address City State Zip: 100 Sun Polymers Drive, Mooresville, IN 46158
MSOP: M 109-31777-00036
Reviewed by: Renee Traivaranon
Date: May 7, 2012**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	9,597	0.2	0.2
Summed Potential Emissions in tons/yr	9,598		
CO2e Total in tons/yr	9,656		

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

June 29, 2012

Matthew Niemiec
Sun Polymers International, Inc.
PO Box 249
Mooresville, IN 46158

Re: Public Notice
Sun Polymers International, Inc.
Permit Level: MSOP
Permit Number: 109-31777-00036

Dear Mr. Niemiec:

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

The Office of Air Quality (OAQ) has submitted the draft permit package to the Morgan County Public Library, 110 South Jefferson Street in Martinsville, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Times in Mooresville, Indiana publish this notice no later than June 30, 2012.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Renee Traivaranon, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5615 or dial (317) 234-5615.

Sincerely,
Catherine Denny
Permits Branch
Office of Air Quality

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



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

June 29, 2012

The Times
P.O. Box 308
Mooresville, Indiana 46158

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Sun Polymers International INC

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Saturday June 30, 2012.

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

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Catherine Denny at 800-451-6027 and ask for extension 3-9488 or dial 317-233-9488

Sincerely,
Catherine Denny
Permit Branch
Office of Air Quality

Permit Level: MSOP
Permit Number: 109-31777-00036

Enclosure
PN Newspaper.dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

Thomas W. Easterly
Commissioner

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

June 29, 2012

To: Morgan County Public Library

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

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

Applicant Name: Sun Polymers International Inc
Permit Number: 109-31777-00036

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Notice of Public Comment

June 29, 2012

Sun Polymer International Inc
109-31777-00036

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

IDEM Staff	CDENNY 6/29/2012 Sun Polymers International, Inc. 109-31777-00036 (draft)		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	Type of Mail: CERTIFICATE OF MAILING ONLY	

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		Matthew Niemiec Sun Polymers International, Inc. PO Box 249 Mooresville IN 46158 (Source CAATS)										
2		Kevin Harris GM Sun Polymers International, Inc. PO Box 249 Mooresville IN 46158 (RO CAATS)										
3		Morgan County Commissioners 180 South Main Street Martinsville IN 46151 (Local Official)										
4		Morgan Co Public Library 110 S Jefferson St Martinsville IN 46151-1999 (Library)										
5		Mooresville Town Council 4 E Harrison Street Mooresville IN 46158 (Local Official)										
6		Mr. John W. Kilmer Bruce Carter Associates 6330 E 75th Street #150 Indianapolis IN 46250 (Consultant)										
7		Clayton D. & Patricia A. Arthur 5178 Brenda Boulevard Greenwood IN 46143 (Affected Party)										
8		Morgan County Health Department 180 S Main Street, Suite 252 Martinsville IN 46151-1988 (Health Department)										
9		T. K. Forslund 8147 E. Old St. Rd. 144 Mooresville IN 46158 (Affected Party)										
10		David Jones 7977 N. Taylors Rd. Mooresville IN 46158 (Affected Party)										
11		Claudia Parker 6761 Centenary Rd. Mooresville IN 46158 (Affected Party)										
12		James Swails 6568 E. Rosebud Lane Mooresville IN 46158 (Affected Party)										
13		John Thurston 6548 E. Watson Mooresville IN 46158 (Affected Party)										
14												
15												

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