



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 2, 2012

RE: Createc Corporation / 075-31841-00024

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Mr. John Trease, Operational Manager
Createc Corporation
1619 North Meridian Street
Portland, IN 47371

August 2, 2012

Re: 075-31841-00024
2nd Significant Source Modification No. to:
Part 70 Permit (1st Renewal) No.: T075-28002-00024

Dear Mr. Trease,

Createc Corporation was issued Part 70 operating permit (1st Renewal) No. T 075-28002-00024 on March 9, 2009 for a stationary foam packaging manufacturing plant. An application to modify the source was received on May 7, 2012. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction or modification at the source:

- (a) Five (5) Kurtz 13517 molding press, identified as 13517-2 through 13517-6, permitted in 2012, rated at 300 pounds per hour.
- (b) Twenty (20) pre-puff storage silos, permitted in 2012, each with a total maximum storage capacity of approximately 2600 pounds.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13 17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. **Effective Date of the Permit**
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation of the new emissions units is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik of my staff at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.

Sincerely,



Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments

MDM

cc: File - Jay County
Jay County Health Department
Air Compliance and Enforcement



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Part 70 Significant Source Modification

OFFICE OF AIR QUALITY

**Createc Corporation
1619 North Meridian
Portland, Indiana 47371**

(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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Significant Source Modification No.: T075-31841-00024	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 2, 2012

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CERTIFICATION
EMERGENCY OCCURRENCE REPORT
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION
Part 70 Quarterly Reports
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Attachment A: 40 CFR 60, Subpart Dc

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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

Source Address:	1619 North Meridian, Portland, Indiana 47371
General Source Phone Number:	260-726-9333
SIC Code:	3086
County Location:	Jay
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) natural gas-fired boiler with #2 fuel oil as backup, identified as B1, rated at 10.5 million British thermal units per hour (MMBtu/hr), constructed in 1979 exhausting through one (1) stack, identified as B1;
- (b) One (1) natural gas-fired boiler with #2 fuel oil as backup, identified as B2, rated at 12.6 MMBtu/hr, constructed in 1981, exhausting through one (1) stack, identified as B2;
- (c) One (1) manufacturing line, Line 1, consisting of the following:
 - (1) Eight (8) molding machines, identified as one (1) Carcano H-90 and six (6) Carcano H-150 presses, constructed prior to 2001, and one (1) Alessio molding machine constructed in 2007, with a combined capacity of 1,220 pounds per hour of expanded polystyrene beads, exhausting to stacks F-1 through F-5;
 - (2) One (1) Hirsch 6000 pre-expander, constructed in 2001 (PE2) with a capacity of 1,250 pounds per hour of expanded polystyrene beads, exhausting to stack S-PE2.
- (d) Two (2) Hirsch 6000 pre-expanders, identified as PE4 and PE5, permitted in 2011, each rated at 1250 pounds per hour, and exhausting to stacks S-PE4 and S-PE5, respectively.
- (e) Thirty (30) pre-puff storage silos, identified as PPS1 – PPS30, permitted in 2011-2012, with a total maximum storage capacity of approximately 1200 pounds in ten (10) of the silos, and 2600 pounds in twenty (20) of the silos.
- (f) Five (5) Kurtz 813 molding presses, identified as 813-1, 813-2, 813-3, 813-4 and 813-5, permitted in 2011-2012, each rated at 200 pounds per hour.

- (g) Four (4) Kurtz 68 molding presses, identified as 68-1, 68-2, 68-3 and 68-4 permitted in 2011-2012, each rated at 175 pounds per hour.
- (h) One (1) Kurtz 13517 molding press, identified as 13517, permitted in 2011, rated at 300 pounds per hour.
- (i) Two (2) Kurtz 1014 molding presses, identified as 1014-1 and 1014-2, permitted in 2011, rated at 250 pounds per hour.
- (j) One (1) natural gas-fired boiler, identified as B3, rated at 29.3 million British thermal units per hour (MMBtu/hr), permitted in 2011, exhausting through one (1) stack, identified as S-B3.
- (k) Five (5) Kurtz 13517 molding press, identified as 13517-2 through 13517-6, permitted in 2012, rated at 300 pounds per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

One parts washer, constructed in 2006, using mineral spirits, having a vapor pressure equal to or less than 0.7 kPa; 5 mmHG; or 0.1 psi measured at 200C (68 OF); the use of which does not exceed 145 gallons per 12 months. [326 IAC 8-3-2] [326 IAC 8-3-5]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T075-28002-00024, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (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 or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T075-28002-00024 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported 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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

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

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in 1997.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (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 maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and 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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS: Boilers

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

- (a) One (1) natural gas-fired boiler with #2 fuel oil as backup, identified as B1, rated at 10.5 million British thermal units per hour (MMBtu/hr), constructed in 1979 exhausting through one (1) stack, identified as B1;
- (b) One (1) natural gas-fired boiler with #2 fuel oil as backup, identified as B2, rated at 12.6 MMBtu/hr, constructed in 1981, exhausting through one (1) stack, identified as B2;
- (c) One (1) natural gas-fired boiler equipped with low-NOx burners, identified as B3, rated at 29.3 million British thermal units per hour (MMBtu/hr), permitted in 2011, exhausting through one (1) stack, identified as S-B3.

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

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

D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(b)), particulate emissions from Boilers B1 and B2, which were constructed after June 8, 1972, shall be limited to 0.6 pounds of particulate matter per million British thermal units heat input each.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from boilers B1 and B2, rated at 10.5 and 12.6 MMBtu per hour, respectively, shall not exceed five-tenths (0.5) pound per MMBtu heat input per boiler. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.1.4 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

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

Where:

P_t=Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q=Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input
= 52.4 mmBTU/hr

Based on the above, the particulate emissions from boiler B3 shall be limited to 0.4 lb/mmBTU.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from boilers B1 and B2, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of boilers B1 and B2 stack exhausts shall be performed once per day during normal daylight operations when burning fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the boilers B1 and B2 stack exhaust once per day when burning oil. The Permittee shall include in its record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS: Manufacturing line

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

- (a) One (1) manufacturing line consisting of the following:
 - (1) Eight (8) molding machines, identified as one (1) Carcano H-90 and six (6) Carcano H-150 presses, constructed prior to 2001, and one (1) Alessio molding machine constructed in 2007, with a combined capacity of 1,220 pound per hour of expanded polystyrene beads, exhausting to stacks F-1 through F-5;
 - (2) One (1) Hirsch 6000 pre-expander, constructed in 2001 (PE2), with a combined capacity of 1,250 pound per hour of expanded polystyrene beads, exhausting to stack S-PE2.
- (b) Two (2) Hirsch 6000 pre-expanders, identified as PE4 and PE5, permitted in 2011, each rated at 1250 pounds per hour, and exhausting to stacks S-PE4 and S-PE5, respectively.
- (c) Thirty (30) pre-puff storage silos, identified as PPS1 – PPS30, permitted in 2011-2012, with a total maximum storage capacity of approximately 1200 pounds in ten (10) of the silos, and 2600 pounds in twenty (20) of the silos.
- (d) Five (5) Kurtz 813 molding presses, identified as 813-1, 813-2, 813-3, 813-4 and 813-5, permitted in 2011-2012, each rated at 200 pounds per hour.
- (e) Four (4) Kurtz 68 molding presses, identified as 68-1, 68-2, 68-3 and 68-4 permitted in 2011-2012, each rated at 175 pounds per hour.
- (f) One (1) Kurtz 13517 molding press, identified as 13517, permitted in 2011, rated at 300 pounds per hour.
- (g) Two (2) Kurtz 1014 molding presses, identified as 1014-1 and 1014-2, permitted in 2011, rated at 250 pounds per hour.
- (h) Five (5) Kurtz 13517 molding press, identified as 13517-2 through 13517-6, permitted in 2012, rated at 300 pounds per hour.

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

- (a) The total VOC emissions from the Manufacturing Line described above, including molding equipment installed in 2011 and 2012, shall be limited to less than 247 tons per twelve (12) consecutive month period. Compliance shall be determined using the following equation:

$$\left(\sum (U_E * V_E * L_E) + \sum (U_A * V_A * L_A) \right) / (2000 \text{ pounds/ ton}) \leq \frac{247 \text{ tons per twelve (12) consecutive months}}{12}$$

Where:

U_E = Pounds of EPS-based beads from lot x used during the 12 month period

V_E = VOC content of EPS-based beads from lot x, in percent by weight expressed as a decimal

- L_E = Overall emission loss rate for EPS-based bead usage (98.7% of raw material VOC content)
- U_A = Pounds of ARCEL-based beads from lot x used during the 12 month period
- V_A = VOC content of ARCEL-based beads from lot x, in percent by weight expressed as a decimal
- L_A = Overall emission loss rate for ARCEL-based bead usage (98.7% of raw material VOC content)

- (b) Manufacturing Line VOC emissions from the usage of EPS-based beads shall not exceed 0.987 pound per pound of VOC in the raw material used;
- (c) Manufacturing Line VOC emissions from the usage of ARCEL-based beads shall not exceed 0.987 pound per pound of VOC in the raw material used.

Compliance with these limits shall ensure that the VOC emissions from all emissions units at the source, including insignificant activities, remain below 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

- (a) The total VOC emissions from each of two (2) pre-expanders, identified as PE4 and PE5 (installed in 2011), shall be limited to less than 25 tons per pre-expander per twelve (12) consecutive month period. Compliance shall be determined using the following equation:

$$\left(\sum (U_E * V_E * L_E) + \sum (U_A * V_A * L_A) \right) / (2000 \text{ pounds/ ton}) < 25 \text{ tons per twelve (12) consecutive months per expander}$$

Where:

- U_E = Pounds of EPS-based beads from lot x used during the 12 month period
- V_E = VOC content of EPS-based beads from lot x, in percent by weight expressed as a decimal
- L_E = Pre-expansion phase emission loss rate for EPS-based bead usage (25% of raw material VOC content)
- U_A = Pounds of ARCEL-based beads from lot x used during the 12 month period
- V_A = VOC content of ARCEL-based beads from lot x, in percent by weight expressed as a decimal
- L_A = Pre-expansion phase emission loss rate for ARCEL-based bead usage (41% of raw material VOC content).

- (b) VOC emissions from PE4 and PE5, from the usage of EPS-based beads, shall not exceed 0.25 pound per pound of VOC in the raw material used;
- (c) VOC emissions from PE4 and PE5, from the usage of ARCEL-based beads, shall not exceed 0.41 pound per pound of VOC in the raw material used.
- (d) Any change or modification that will cause VOC emissions from either PE4 or PE5 to be equal to or greater than 25 tons per year shall require IDEM OAQ approval before such changes can occur.

This limit shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable to pre-expanders PE4 and PE5.

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

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

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Prior to any change in the manufacturing process the source is required to inform the Office of Air Quality's Compliance Branch. The commissioner may require 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. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emissions limits established in Conditions D.2.1 and D.2.2.
- (1) Weighted-average VOC content of expandable polystyrene molding compound used during the month;
 - (2) The total amount (pounds) of molding compound used each month;
 - (3) The total amount (tons) of VOC emitted each month;
 - (4) Records shall include:
 - (A) Material supplier "certificates of analysis" depicting the VOC content of each molding compound used during the month;
 - (B) Pre-expander production logs depicting the quantity (pounds) and date of each batch of material processed during the month;
 - (C) Calculations of monthly VOC emissions.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS: Insignificant Activities

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

One parts washer, constructed in 2006, using mineral spirits, having a vapor pressure equal to or less than 0.7 kPa; 5 mmHG: or 0.1 psi measured at 200C (68°F); the use of which does not exceed 145 gallons per 12 months. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

D.3.2 Volatile Organic Compounds (VOC) [326 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for the parts washer without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38 C) (one hundred degrees Fahrenheit (100 F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 C) (one hundred degrees Fahrenheit (100 F)), then the drainage facility must be internal such that articles are enclosed under

the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION E.1 FACILITY OPERATION CONDITIONS: Boiler B3

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

- (a) One (1) natural gas-fired boiler, identified as B3, rated at 29.3 million British thermal units per hour (MMBtu/hr), permitted in 2011, exhausting through one (1) stack, identified as S-B3.

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

E.1.1 General Provisions Relating to NSPS Subpart Dc [326 IAC 12-1] [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1-1.

E.1.2 New Source Performance Standards for Small Industrial-Commercial-Institutional Generating Units [40 CFR Part 60, Subpart Dc]

The Permittee, which uses boiler B3, is subject to the following requirements under the New Source Performance Standards for Small Industrial-Commercial-Institutional Generating Units, 40 CFR 60, Subpart Dc (included as Attachment A of this permit), which is incorporated by reference as 326 IAC 12:

- (1) 40 CFR 60.40c
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.48c(a)
- (4) 40 CFR 60.48c(g)(2)
- (5) 40 CFR 60.48c(i)
- (6) 40 CFR 60.48c(j)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Createc Corporation
Source Address: 1619 North Meridian, Portland, Indiana 47371
Part 70 Permit No.: T075-28002-00024

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Createc Corporation
Source Address: 1619 North Meridian, Portland, Indiana 47371
Part 70 Permit No.: T075-28002-00024

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: Createc Corporation
Source Address: 1619 North Meridian, Portland, Indiana 47371
Part 70 Permit No.: T075-28002-00024

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report**

Source Name: Createc Corporation
Source Address: 1619 North Meridian, Portland, Indiana 47371
Part 70 Permit No.: T075-28002-00024
Facility: Manufacturing Line (installed in 2006) - Line 1, and equipment installed in 2011-2012
Parameter: VOC Emissions
Limit: The total emissions of volatile organic compounds (VOC) shall be limited to less than 247 tons per twelve (12) consecutive month period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: Createc Corporation
Source Address: 1619 North Meridian, Portland, Indiana 47371
Part 70 Permit No.: T075-28002-00024
Facility: Pre-expander PE4
Parameter: VOC Emissions
Limit: The total emissions of volatile organic compounds (VOC) shall be limited to less than 25 tons per twelve (12) consecutive month period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: Createc Corporation
Source Address: 1619 North Meridian, Portland, Indiana 47371
Part 70 Permit No.: T075-28002-00024
Facility: Pre-expander PE5
Parameter: VOC Emissions
Limit: The total emissions of volatile organic compounds (VOC) shall be limited to less than 25 tons per twelve (12) consecutive month period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Createc Corporation
 Source Address: 1619 North Meridian, Portland, Indiana 47371
 Part 70 Permit No.: T075-28002-00024

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a Part 70
Significant Source and Significant Permit Modification**

Source Description and Location

Source Name:	Createc Corporation
Source Location:	1619 North Meridian, Portland, Indiana 47371
County:	Jay
SIC Code:	3086
Operation Permit No.:	T075-28002-00024
Operation Permit Issuance Date:	March 9, 2009
Significant Source Modification No.:	075-31841-00024
Significant Permit Modification No.:	075-31869-00024
Permit Reviewer:	Madhurima Moulik

Existing Approvals

The source was issued Part 70 Operating Permit No. T075-28002-00024 on March 9, 2009. The source has since received the following approvals:

- (a) Interim Significant Source Modification No.: 075-30328I-00024 issued on April 20, 2011;
- (b) Interim Significant Source Modification No.: 075-30372I-00024 issued on July 8, 2011;
- (c) Significant Source Modification No.: 075-30328-00024 issued on July 28, 2011;
- (d) Significant Permit Modification No.: 075-30372-00024 issued on August 4, 2011;
- (e) Administrative Amendment No.:075-31923-00024 issued on June 6, 2012.

County Attainment Status

The source is located in Jay County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for 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. Jay 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}**
 Jay County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
 Jay County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (ton/yr)
PM	7.91
PM ₁₀	4.5
PM _{2.5}	4.5
SO ₂	50.95
VOC	<250
CO	21.97
NO _x	28.33
GHGs as CO ₂ e	<100,000
Single HAP	<10
Combined HAPs	<25

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more, emissions of GHGs are less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) These emissions are based upon the Technical Support Documents for Part 70 Renewal T075-28002-00024 and SSM No. 075-30328-00024.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Createc Corporation on May 7, 2012, relating to the installation replacement and new equipment at the existing facility. The following is a list of the proposed emission units and pollution control devices:

- (a) Five (5) Kurtz 13517 molding press, identified as 13517-2 through 13517-6, permitted in 2012, rated at 300 pounds per hour.
- (b) Twenty (20) pre-puff storage silos, permitted in 2012, each with a total maximum storage capacity of approximately 2600 pounds.

Several of the pre-puff silos are replacements for existing pre-puff silos (identified as PPS-PPS25) that were permitted in 2011, for a total of 30 pre-puff silos, to be collectively identified now as PPS1-PPS30.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
DV1-DV3	13517-2, 13517-3, 13517-4, 13517-5, 13517-6	28	0.83	500	200
S-PPS1	PPS11-PPS30	3	2.0	7500	70
S-PPS2	PPS11-PPS30	3	2.0	7500	70

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	---
PM ₁₀	---
PM _{2.5}	---
SO ₂	---
VOC	59.8
CO	---
NO _x	---
Single HAPs	<10
Total HAPs	<25

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

This source modification is subject to significant source modification rules because pursuant to 326 IAC 2-7-10.5(g)(4)(D) which states that a significant source modification is appropriate for modifications with a potential to emit of greater than 25 tons per year of VOC. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification because, pursuant to 326 IAC 2-7-12(b)(1)(C)(i), a minor permit modification is not allowed for permit changes that require or change a case-by-case determination of an emission limitation or standard. The proposed emission units are subject to a PSD minor emission limitation for VOCs under 326 IAC 2-2,

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Potential to Emit (ton/yr)							
	PM	PM ₁₀	PM _{2.5} *	SO ₂	VOC	CO	NO _x	GHGs
Five (5) Kurtz molding presses	---	---	---	---	To be included in existing emission limitation of < 247 tons/yr	---	---	---
Twenty (20) Pre-puff storage bags	---	---	---	---		---	---	---
Total for Modification	---	---	---	---		---	---	---
Source-wide Emissions	7.91	4.5	4.5	50.95	<250	21.97	28.33	<100,000
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e

*PM_{2.5} listed is direct PM_{2.5}.
 --- Negligible

This existing minor stationary source remains a minor source under 326 IAC 2-2 because the emissions after modification are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

NSPS:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

- (b) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, (40 CFR 63 Subpart III (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production), M M M M M (National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam Fabrication Operations), and O O O O O O (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources)) because expanded polystyrene beads are used and not polyurethane.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to every new or modified pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The proposed emission units do not use any control devices. Therefore, CAM does not apply to any of the proposed emission units.

State Rule Applicability Determination

326 IAC 2-2 (PSD)

The unrestricted potential to emit of VOC from this operation is greater than 250 tons per year. However, the VOC usage shall be limited such that the emissions of VOCs per twelve consecutive month period are below 250 tons, with compliance determined at the end of each month. The proposed emission units shall be included in this limitation, rendering 326 IAC 2-2 not applicable to this modification.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the proposed emission units will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

The proposed Kurtz molding presses and pre-puff bags are not subject to 326 IAC 6-3-2 because these units do not have any particulate emissions.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The potential VOC emissions from each of the five (5) Kurtz molding presses and the twenty (20) pre-puff bags are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal

rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Determination Requirements applicable to this modification are as follows:

There are no specific compliance determination requirements for the proposed emission units. Prior to any change in the manufacturing process at this facility, the Permittee is required to inform the Office of Air Quality's Compliance Branch. The commissioner may require 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. Testing shall be conducted in accordance with Section C- Performance Testing.

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

There is no compliance monitoring requirements for the proposed emission units.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T075-28002-00024. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

- (a) The facility descriptions in sections A.2 and D.2 have been modified to include the proposed emission units including the pre-puff storage silos and molding presses. In addition, some existing molding machines and pre-expanders have been removed from the source and therefore have been deleted from the permit. Additionally, some minor changes have been made to emission unit descriptions.
- (b) Condition D.2.2 - Volatile Organic Compounds [326 IAC 8-1-6] has been modified (and the report form for this requirement deleted) to delete references to pre-expander PE3 which has been removed from the source.
- (c) The Part 70 quarterly report form has been modified to include the recordkeeping requirement for the proposed molding presses.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) natural gas-fired boiler with #2 fuel oil as backup, identified as B1, rated at 10.5 million British thermal units per hour (MMBtu/hr), constructed in 1979 exhausting through one (1) stack, identified as B1;
- (b) One (1) natural gas-fired boiler with #2 fuel oil as backup, identified as B2, rated at 12.6 MMBtu/hr, constructed in 1981, exhausting through one (1) stack, identified as B2;
- (c) One (1) manufacturing line, Line 1, consisting of the following:

- (1) ~~Fifteen (15)~~ **Eight (8)** molding machines, **identified as one (1) Carcano H-90 and six (6) Carcano H-150 presses, constructed prior to 2001**, ~~ten (10) constructed in 1976 and four (4) constructed in 2004~~, and one (1) Alessio molding machine constructed in 2007 with a combined capacity of 1,220 pounds per hour of expanded polystyrene beads, exhausting to stacks F-1 through F-5;
- (2) ~~Three (3)~~ **One (1) Hirsch 6000** pre-expanders, ~~one (1) constructed in 1976 (PE1), one (1) constructed in 2001 (PE2), and one (1) constructed in 2006 (PE3)~~, with a combined capacity of ~~1,220~~ **1,250** pounds per hour of expanded polystyrene beads, exhausting to stack ~~S-PE2~~ **S-PE2** ~~stacks F-1 through F-5~~.

....

- (e) **Thirty (30)** ~~Twenty-five (25)~~ pre-puff storage silos, identified as PPS1 – ~~PPS25~~ **PPS30**, permitted in 2011-~~2012~~, with a total maximum storage capacity of approximately 1200 pounds **in ten (10) of the silos, and 2600 pounds in twenty (20) of the silos.**
- (f) Five (5) Kurtz 813 molding presses, identified as 813-1, 813-2, 813-3, 813-4 and 813-5 permitted in 2011, each rated at 200 pounds per hour.
- (g) Four (4) Kurtz 68 molding presses, identified as 68-1, 68-2, 68-3 and 68-4 permitted in 2011-~~2012~~, each rated at 175 pounds per hour.

....

- (j) **Five (5) Kurtz 13517 molding press, identified as 13517-2 through 13517-6, permitted in 2012, rated at 300 pounds per hour.**

SECTION D.2 FACILITY OPERATION CONDITIONS: Manufacturing line

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

- (a) One (1) manufacturing line consisting of the following:
 - (1) ~~Fifteen (15)~~ **Eight (8)** molding machines, **identified as one (1) Carcano H-90 and six (6) Carcano H-150 presses, constructed prior to 2001**, ~~ten (10) constructed in 1976 and four (4) constructed in 2004~~, and one (1) Alessio molding machine constructed in 2007 with a combined capacity of 1,220 pound per hour of expanded polystyrene beads, exhausting to stacks F-1 through F-5;
 - (2) ~~Three (3)~~ **One (1) Hirsch 6000** pre-expanders, ~~one (1) constructed in 1976 (PE1), one (1) constructed in 2001 (PE2), and one (1) constructed in 2006 (PE3)~~, with a combined capacity of ~~1,220~~ **1,250** pound per hour of expanded polystyrene beads, **exhausting to stack S-PE2** ~~stacks F-1 through F-5~~.
- (b) Two (2) Hirsch 6000 pre-expanders, identified as PE4 and PE5, permitted in 2011, each rated at 1250 pounds per hour, and exhausting to stacks S-PE4 and S-PE5, respectively.
- (c) Thirty (30) pre-puff storage silos, identified as PPS1 – PPS30, permitted in 2011-2012, with a total maximum storage capacity of **approximately 1200 pounds in ten (10) of the silos, and 2600 pounds in twenty (20) of the silos.**
- (d) Five (5) Kurtz 813 molding presses, identified as 813-1, 813-2, 813-3, 813-4 and 813-5, permitted in 2011, each rated at 200 pounds per hour.

- (e) Four (4) Kurtz 68 molding presses, identified as 68-1, 68-2, 68-3 (~~all permitted in 2011~~) and 68-4, **permitted in 2011-2012**, each rated at 175 pounds per hour.
- (f) One (1) Kurtz 13517 molding press, identified as 13517, permitted in 2011, rated at 300 pounds per hour.
- (g) Two (2) Kurtz 1014 molding presses, identified as 1014-1 and 1014-2, permitted in 2011, rated at 250 pounds per hour.
- (h) **Five (5) Kurtz 13517 molding press, identified as 13517-2 through 13517-6, permitted in 2012, rated at 300 pounds per hour.**

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

- (a) The total VOC emissions from the Manufacturing Line described above, **including molding equipment installed in 2011 and 2012**, shall be limited to less than 247 tons per twelve (12) consecutive month period. Compliance shall be determined using the following equation:

$$(\sum (U_E * V_E * L_E) + \sum (U_A * V_A * L_A)) / (2000 \text{ pounds/ ton}) \leq 247 \text{ tons per twelve (12) consecutive months}$$

Where:

U_E = Pounds of EPS-based beads from lot x used during the 12 month period

V_E = VOC content of EPS-based beads from lot x, in percent by weight expressed as a decimal

L_E = Overall emission loss rate for EPS-based bead usage (98.7% of raw material VOC content)

U_A = Pounds of ARCEL-based beads from lot x used during the 12 month period

V_A = VOC content of ARCEL-based beads from lot x, in percent by weight expressed as a decimal

L_A = Overall emission loss rate for ARCEL-based bead usage (98.7% of raw material VOC content)

- (b) Manufacturing Line VOC emissions from the usage of EPS-based beads shall not exceed 0.987 pound per pound of VOC in the raw material used;
- (c) Manufacturing Line VOC emissions from the usage of ARCEL-based beads shall not exceed 0.987 pound per pound of VOC in the raw material used.

Compliance with these limits shall ensure that the VOC emissions from all emissions units at the source, including insignificant activities, remain below 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

- (a) The total VOC emissions from each of ~~three (3)~~ **two (2)** pre-expanders, identified as ~~PE3 (installed in 2006)~~ and PE4 and PE5 (installed in 2011), shall be limited to less than 25 tons per pre-expander per twelve (12) consecutive month period. Compliance shall be determined using the following equation:

$$(\sum (U_E * V_E * L_E) + \sum (U_A * V_A * L_A)) / (2000 \text{ pounds/ ton}) < 25 \text{ tons per twelve (12) consecutive months per expander}$$

Where:

- U_E = Pounds of EPS-based beads from lot x used during the 12 month period
 - V_E = VOC content of EPS-based beads from lot x, in percent by weight expressed as a decimal
 - L_E = Pre-expansion phase emission loss rate for EPS-based bead usage (25% of raw material VOC content)
 - U_A = Pounds of ARCEL-based beads from lot x used during the 12 month period
 - V_A = VOC content of ARCEL-based beads from lot x, in percent by weight expressed as a decimal
 - L_A = Pre-expansion phase emission loss rate for ARCEL-based bead usage (41% of raw material VOC content).
- (b) VOC emissions from ~~PE3~~, PE4 and PE5, from the usage of EPS-based beads, shall not exceed 0.25 pound per pound of VOC in the raw material used;
- (c) VOC emissions from ~~PE3~~, PE4 and PE5, from the usage of ARCEL-based beads, shall not exceed 0.41 pound per pound of VOC in the raw material used.
- (d) Any change or modification that will cause VOC emissions from either ~~PE3~~, PE4 or PE5 to be equal to or greater than 25 tons per year shall require IDEM OAQ approval before such changes can occur.

This limit shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable to pre-expanders ~~PE3~~, PE4 and PE5.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Report

Source Name: Createc Corporation
 Source Address: 1619 North Meridian, Portland, Indiana 47371
 Part 70 Permit No.: T075-28002-00024
 Facility: Manufacturing Line (installed in 2006) - Line 1, and ~~manufacturing line~~ **equipment** installed in 2011-**2012**
 Parameter: VOC Emissions
 Limit: The total emissions of volatile organic compounds (VOC) shall be limited to less than 247 tons per twelve (12) consecutive month period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Report~~

Source Name: ~~_____ Createc Corporation~~
 Source Address: ~~_____ 1619 North Meridian, Portland, Indiana 47371~~
 Part 70 Permit No.: ~~_____ T075-28002-00024~~
 Facility: ~~_____ Pre-Expander constructed in 2006~~
 Parameter: ~~_____ Volatile Organic Compounds (VOC) Emissions~~
 Limit: ~~_____ The total emissions of volatile organic compounds (VOC) at each the pre-expander (PE3), constructed in 2006, shall be limited to less than 25 tons per twelve (12) consecutive month period~~

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

_____ Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion and Recommendation

The construction and operation of the proposed emission units shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 075-31841-00024 and Significant Permit Modification No. 075-31869-00024. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Company Name: Createc Corporation
 Address City IN Zip: 1619 North Meridian, Portland, Indiana 47371
 SSM No.: 075-31841-00024
 SPM No.: 075-31869-00024
 Reviewer: Madhurima D. Moulik
 Date: 5/18/2012

Table 1: SUMMARY OF MAXIMUM VOC EMISSIONS (new equipment only)
Createc Corporation, Portland, IN

Equipment Type:	Molding	Pre-puff Storage	
Make/Model:	Kurtz 13517	N/A	Total
Number of Units:	5	20	Emissions
*Total VOC Potential, lbs/hour	11.7	23.0	34.7
VOC Potential per Unit, lbs/hour	2.3	1.2	3.5
*Unrestricted VOC Potential, tons/yr	51.2	23.6	74.8
VOC Potential per Unit, tons/yr	10.2	1.2	11.4
*Restricted Maximum VOC, tons/yr	41.0	18.8	59.8
Maximum VOC per Unit, tons/yr	8.2	0.9	9.1

* Based on maximum value between EPS and Arcel materials - see Tables 2 and 3

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**Table 2: VOC EMISSION ESTIMATES FROM EPS MATERIAL PROCESSING (new equipment only)
 Createc Corporation, Portland, IN**

Equipment Type: Make/Model: Number of Units:	Molding Kurtz 13517 5	Pre-puff Storage N/A 20	Total Emissions
Maximum Raw Bead VOC Content	6.0%	6.0%	
*VOC loss rate	13%	19%	
Hourly Max. Production (lbs/unit)	300	1,200	
Production per Unit:			
**Potential Production (lbs/yr)	2,628,000	206,667	
***Maximum Projected Production (lbs/yr)	2,102,400	165,333	
Emissions per Unit:			
Unrestricted VOC Potential, lbs/hour	2.3	13.7	285.3
Unrestricted VOC Potential, lbs/year	20,498	2,356	149,612.0
Unrestricted VOC Potential, tons/yr	10.2	1.2	74.8
***Requested Maximum VOC, tons/yr	8.2	0.9	59.8

Example Calculation:

Emissions are calculated as the product of throughput rate, raw bead VOC content, and the VOC loss rate for the particular process phase.

Ex. Hourly VOC from Kurtz 13517 = (300 lb/hr)(0.06 lb VOC/lb EPS)(13% loss rate) = 2.34 lb/hr

* VOC Loss Rates per Process Phase (by weight):

Pre-expansion	25%
Pre-puff Storage	19%
Molding	13%
Finished Goods Storage	40%
Total	97%

** Pre-puff Storage potential throughput based on plant-wide throughput divided by total number of bags

Plant-wide maximum EPS throughput =	6,200,000 lbs
Existing number of PPS bags =	10
Number of new PPS bags =	20

*** Based on 80% of potential values

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 Date: 5/18/2012

**Table 3: VOC EMISSION ESTIMATES FROM ARCEL MATERIAL PROCESSING (new equipment only)
 Createc Corporation, Portland, IN**

Equipment Type: Make/Model: Number of Units:	Molding Kurtz 13517 5	Pre-puff Storage N/A 3	Total Emissions
Maximum Raw Bead VOC Content	12.5%	12.5%	
*VOC loss rate	5%	23%	
Hourly Max. Production (lbs/unit)	240	800	
Production per Unit:			
**Potential Production (lbs/yr)	2,102,400	166,667	
***Maximum Projected Production (lbs/yr)	1,681,920	100,000	
Emissions per Unit:			
Unrestricted VOC Potential, lbs/hour	1.5	23.0	76.5
Unrestricted VOC Potential, lbs/year	13,140	4,792	80,075.0
Unrestricted VOC Potential, tons/yr	6.6	2.4	40.0
***Requested Maximum VOC, tons/yr	5.3	1.4	30.6

Example Calculation:

Emissions are calculated as the product of throughput rate, raw bead VOC content, and the VOC loss rate for the particular process phase.

Ex. Hourly VOC from Kurtz 13517 = (240 lb/hr)(0.125 lb VOC/lb Arcel)(5% loss rate) = 1.5 lb/hr

* VOC Loss Rates per Process Phase (by weight):

Pre-expansion	41%
Pre-puff Storage	23%
Molding	5%
Finished Goods Storage	<u>28%</u>
Total	97%

** Pre-puff Storage potential throughput based on plant-wide throughput divided by total number of bags

Plant-wide maximum Arcel throughput =	500,000 lbs
Existing number of PPS bags =	0 (from 2011 application)
Number of new PPS bags =	3

*** Based on 80% of potential values, except for PPS which is a requested maximum

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 Date: 5/18/2012

**Table 4: Air Toxics from Kurtz 13517 Molding
 Createc Corporation, Portland, IN**

WORST-CASE TOXICS PER MATERIAL						WORST-CASE EMISSION RATES** (values are emissions per each Molding Press)				
Air Toxic Compounds:	CAS Number	EPS Materials		Arcel Materials		RESTRICTED EMISSIONS			TYPICAL EMISSIONS	
		Conc. ppmw	Loss rate % by wt.	Conc. ppmw	Loss rate % by wt.	(Lbs/hr)	(Lbs/yr)	(tons/yr)	(Lbs/yr)	(tons/yr)
Acetophenone	98-86-2	1,490	16	800	70	0.060	423.8	0.212	339.1	0.170
Benzene	71-43-2	150	83	25	70	0.017	117.8	0.059	94.2	0.047
Cumene	98-82-8	115	23	50	70	0.004	26.5	0.013	21.2	0.011
Ethyl Benzene	100-41-4	500	33	5,000	70	0.378	2,649.0	1.325	2,119.2	1.060
Styrene monomer	100-42-5	800	69	50	70	0.075	522.2	0.261	417.8	0.209
Xylenes	1330-20-7	150	67	100	70	0.014	95.1	0.048	76.1	0.038
TOTALS:						0.547	3,834	1.917	3,068	1.534

<u>Period</u>	<u>EPS thruput per press</u>	<u>Arcel thruput per press</u>
Typical Annual**:	1,681,920 lbs	1,345,536 lbs
Restricted Annual:	2,102,400 lbs	1,681,920 lbs
Hourly maximum:	300 lbs	240 lbs

Toxic Emissions = (Toxic Concentration, as a decimal) x (pounds processed) x (% loss rate for toxics) x (% of loss attributed to Molding)

Process phase losses, as a percent of total loss, are:

Pre-Expansion (PX) loss = 45%, Pre-Puff Storage (PPS) loss = 10%, Molding Press (MP) loss = 45%

* Emissions are the worst case between the two materials, assuming either material is processed exclusively

** Based on 80% of Restricted Annual

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 Date: 5/18/2012

**Table 5: Air Toxics from Pre-puff Storage
 Createc Corporation, Portland, IN**

		WORST-CASE TOXICS PER MATERIAL				Represents Emissions from all New Storage Bags				
Air Toxic Compounds:	CAS Number	EPS Materials		Arcel Materials		RESTRICTED EMISSIONS			TYPICAL EMISSIONS	
		Conc. ppmw	Loss rate % by wt.	Conc. ppmw	Loss rate % by wt.	(Lbs/hr)	(Lbs/yr)	(tons/yr)	(Lbs/yr)	(tons/yr)
Acetophenone	98-86-2	1,490	16	800	70	0.045	78.8	0.039	59.1	0.030
Benzene	71-43-2	150	83	25	70	0.015	41.2	0.021	30.9	0.015
Cumene	98-82-8	115	23	50	70	0.003	8.7	0.004	6.6	0.003
Ethyl Benzene	100-41-4	500	33	5,000	70	0.280	105.0	0.053	52.5	0.026
Styrene monomer	100-42-5	800	69	50	70	0.066	182.5	0.091	136.9	0.068
Xylenes	1330-20-7	150	67	100	70	0.012	33.2	0.017	24.9	0.012
TOTALS:						0.421	450	0.225	311	0.155

<u>Period</u>	<u>EPS thruput all bags</u>	<u>Arcel thruput all bags</u>
Typical Annual:	2,480,000 lbs	150,000 lbs
Restricted Annual:	3,306,667 lbs	300,000 lbs
Hourly maximum:	1,200 lbs	800 lbs

Toxic Emissions = (Toxic Concentration, as a decimal) x (pounds processed) x (% loss rate for toxics) x (% of loss attributed to PPS)

Process phase losses, as a percent of total loss, are:

Pre-Expansion (PX) loss = 45%, Pre-Puff Storage (PPS) loss = 10%, Molding Press (MP) loss = 45%



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: John Trease
Createc Corporation
1619 N Meridian St
Portland, IN 47371

DATE: August 2, 2012

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

SUBJECT: Final Decision
Title V
075-31841-00024

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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August 2, 2012

TO: Jay County Public Library

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

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

Applicant Name: Createc Corporation
Permit Number: 075-31841-00024

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 08/02/2012 Createc Corporation 075-31841-00024 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		John Trease Createc Corporation 1619 N Meridian St Portland IN 47371 (Source CAATS)									
2		Ronald G Leach VP - Sonoco Protective Packaging Createc Corporation c/o Tegrant, PO Box 448 New Brighton PA 15066 (RO CAATS)									
3		Jay County Commissioners Jay County Courthouse Portland IN 47371 (Local Official)									
4		Portland City Council and Mayors Office 321 N. Meridian Portland IN 47371 (Local Official)									
5		Jay County Public Library 315 N. Ship Street Portland IN 47371 (Library)									
6		Jay County Health Department 504 West Arch Street Portland IN 47371 (Health Department)									
7		Victoria BrindAmour Tegrant Corp. - EHS & Regulatory Affairs Dept. PO Box 448 New Brighton PA 15066 (Source – addl contact)									
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