INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: August 5, 2013

RE: Ilpea Industries, Inc. / 143-32451-00018

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.dot 6/13/13

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New Source Review and Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Ilpea Industries Inc.
1320 S. Main Street
Scottsburg, Indiana 47170

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

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F143-32451-00018	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 5, 2013 Expiration Date: August 5, 2023

TABLE OF CONTENTS

A. SOURCE SUMMARY 4
- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]
- A.4 FESP Applicability [326 IAC 2-8-2]

B. GENERAL CONDITIONS 8
- B.1 Definitions [326 IAC 2-8-1]
- B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]
- B.5 Severability [326 IAC 2-8-4(4)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
- B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]
- B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]
- B.12 Emergency Provisions [326 IAC 2-8-12]
- B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
- B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
- B.16 Permit Renewal [326 IAC 2-8-3(h)]
- B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
- B.19 Source Modification Requirement [326 IAC 2-8-11.1]
- B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]
- B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
- B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]
- B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS 18

Emission Limitations and Standards [326 IAC 2-8-4(1)]
- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
- C.2 Overall Source Limit [326 IAC 2-8]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]
- C.9 Performance Testing [326 IAC 3-6]

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]
C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]
C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS.....**Error! Bookmark not defined.**

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.1.1 PM PSD Minor Limit [326 IAC 2-2]
D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]
D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]
D.1.4 Prevention Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements
D.1.5 Particulate Control
D.1.6 Testing Requirements [326 IAC 2 1.1 11]

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]
D.1.7 Visible Emissions Notations
D.1.8 Parametric Monitoring
D.1.9 Broken or Failed Bag Detection
D.1.10 Scrubber Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
D.1.11 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 33

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Certification Form..... 34
Emergency Occurrence Form..... 35
Quarterly Deviation and Compliance Monitoring Report Form..... 37

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastics and magnetic plastics manufacturing operation.

Source Address:	1320 S. Main Street, Scottsburg, Indiana 47170
General Source Phone Number:	812-752-2526
SIC Code:	3053 (Gaskets, Packaging and Sealing Devices) 3099 (Primary Metal Products, n.e.c.)
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The source consists of the following permitted emission units:

Plastic Pellet Process

Note: The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

(a) Three (3) polyvinyl chloride silos, constructed in 1999, identified as EU-106, EU-107, and EU-108, with a maximum capacity of 7,950 tons per year each, for the storage of calcium carbonate, using a bin vent filter for control, and exhausting outdoors.

Note: The calcium carbonate material is vacuumed from a tanker to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate that can be used.

(b) One (1) Banbury mixer, constructed in 1999, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

Note: The baghouse C-122 is a common control device used for the Banbury Mixer EU-122 and the Cibec Mixer EU-123.

(c) One (1) plastic pellet production line, constructed in 1999, identified as EU-112, with a maximum capacity of 1,000 pounds per hour, no control and exhausting to stack S-112.

(d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.

(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-114, with a maximum capacity of 1,800 pounds per hour, no control and exhausting to stack S-114.

(f) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.

(g) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.

(h) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(i) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(j) One (1) plastic pellet production line, identified as EU-119, approved for construction in 2013, maximum capacity of 600.00 pound per hour, no control and exhausting indoors.

Powder Metal Process

(k) One (1) iron oxide silo, approved for construction in 2013, identified as EU-103, with a maximum throughput capacity of 7,000 tons per year, for the storage of iron oxide powder, equipped with a bin vent filter, and directly venting to a weigh hopper, identified as EU-156.

(l) One (1) iron oxide silo, approved for construction in 2013, identified as EU-105, with a maximum throughput capacity of 7,000 tons per year, for the storage of iron oxide powder, equipped with a bin vent filter, and directly venting to a weigh hopper identified as EU-156.

(m) One (1) weigh hopper, approved for construction in 2013, identified as EU-156, with a maximum capacity of 4,930 lbs per day, using a baghouse for control, identified as C-156, exhausting indoors.

(n) One (1) weigh hopper, approved for construction in 2013, identified as EU-157, with a maximum capacity of 870 lbs per hour, using a baghouse for control, identified as C-157 and exhausting indoors.

(o) One (1) Cibec Mixer , approved for construction in 2013, identified as EU-123, with a maximum capacity of 660 pounds per hour, using a baghouse for control, identified as C-122

Note: The baghouse C-122 is a common control device used for the Cibec Mixer EU-123 and Banbury Mixer EU-122.

(p) One (1) rotary calcining kiln, approved for construction in 2013, identified as EU-101, with a maximum capacity of 3,000 lbs of iron oxide per hour, using a wet scrubber as control, and exhausting to stack S-101-2.

(q) One (1) rotary calcining kiln, approved for construction in 2013, identified as EU-102, with a maximum capacity of 3,500 lbs of iron oxide per hour, using a wet scrubber as control, and exhausting to stack S-101-2.

Note: Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron klinkers. The klinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

(r) One (1) Moritz Mill, approved for construction in 2013, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting indoors.

(s) One (1) Moritz Mill, approved for construction in 2013, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting indoors.

(t) One (1) Moritz Mill, approved for construction in 2013, identified as EU-154, with a maximum capacity of 2,380 lbs per hour, using a baghouse for control, identified as C-154, and exhausting indoors.

(u) One (1) twin banbury/extruder/mixer line, approved for construction in 2013, identified as EU-123, with a maximum capacity of 660 pounds per hour, using a baghouse for control, identified as C-122, consisting of the following:

(1) One (1) 275- liter capacity mixer, and

(2) Two (2) twin banbury extruders/mixers

Note 1: The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are tin chloride-halogentated activator, textile mordant, antioxidant (coba, BAS, special chem 4polymers), stearic acid, black concentrate, process oil, PP melt flow 6, phenolic resin in mineral oil, 40% extended EPDM, rubee grade zinc oxide, talc from imerys.

Note 2: The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123 and Banbury Mixer EU-122.

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

The source also consists of the following insignificant activities:

(a) One (1) natural gas-fired air make-up unit, constructed in 1999, identified as EU-119, with a maximum heat input of 1.1 MMBtu per hour, exhausting to stack S-119.

(b) Four (4) natural gas-fired space heaters, constructed in 1999, identified as EU-136, EU-141, EU-142, and EU-143, with a maximum heat input of 0.14 MMBtu per hour each, exhausting to stacks S-136, S-141, S-142, and S-143.

(c) Eight (8) natural gas-fired space heaters, constructed in 1999, identified as EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, and EU-147, with a maximum heat input of 0.25 MMBtu per hour each, exhausting to stacks S-137, S-138, S-139, S-140, S-144, S-145, S-146, and S-147.

(d) Two (2) natural gas-fired space heaters, constructed in 1999, identified as EU-148 and EU-149, with a maximum heat input of 0.40 MMBtu per hour each, exhausting to stacks S-148 and S-149.

(e) One (1) natural gas-fired Cleaver Brooks boiler, constructed in 1999, identified as EU-151, with a maximum heat input of 2.5 MMBtu per hour, exhausting to stack S-151.

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, and welding equipment.

(g) Repair activities, including the following: Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(h) Conveyors as follows: enclosed systems for conveying plastic raw materials and plastic finished goods.

(i) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines, purging of vessels.

(j) Blowdown for a cooling tower.

(k) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).

(l) Emissions from research and development activities as defined in 326 IAC 2-7-1(21)(D).

(m) One (1) natural gas evaporator, identified as EU-124, approved for construction in 2013, with a maximum heat input rate of 0.95 MMBtu per hour.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F143-32451-00018, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southwest Regional Office and Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304,
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

(a) All terms and conditions of permits established prior to F143-32451-00018 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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. The analog instrument shall be capable of measuring values outside of the normal range.

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

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

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

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to

an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plastic Pellet Process

Note: The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

(a) Three (3) polyvinyl chloride silos, constructed in 1999, identified as EU-106, EU-107, and EU-108, with a maximum capacity of 7,950 tons per year each, for the storage of calcium carbonate, using a bin vent filter for control, and exhausting outdoors.

Note: The calcium carbonate material is vacuumed from a tanker to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate that can be used.

(b) One (1) Banbury mixer, constructed in 1999, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

Note: The baghouse C-122 is a common control device used for the Banbury Mixer EU-122 and the Cibec Mixer EU-123.

(c) One (1) plastic pellet production line, constructed in 1999, identified as EU-112, with a maximum capacity of 1,000 pounds per hour, no control and exhausting to stack S-112.

(d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.

(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-114, with a maximum capacity of 1,800 pounds per hour, no control and exhausting to stack S-114.

(f) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.

(g) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.

(h) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(i) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(j) One (1) plastic pellet production line, identified as EU-119, approved for construction in 2013, maximum capacity of 600.00 pound per hour, no control and exhausting indoors.

Powder Metal Process

(k) One (1) iron oxide silo, approved for construction in 2013, identified as EU-103, with a maximum throughput capacity of 7,000 tons per year, for the storage of iron oxide powder, equipped with a bin vent filter, and directly venting to a weigh hopper, identified as EU-156.

(l) One (1) iron oxide silo, approved for construction in 2013, identified as EU-105, with a maximum throughput capacity of 7,000 tons per year, for the storage of iron oxide powder, equipped with a bin vent filter, and directly venting to a weigh hopper identified as EU-156.

(m) One (1) weigh hopper, approved for construction in 2013, identified as EU-156, with a maximum capacity of 4,930 lbs per day, using a baghouse for control, identified as C-156, exhausting indoors.

(n) One (1) weigh hopper, approved for construction in 2013, identified as EU-157, with a maximum capacity of 870 lbs per hour, using a baghouse for control, identified as C-157 and exhausting indoors.

(o) One (1) Cibec Mixer , approved for construction in 2013, identified as EU-123, with a maximum capacity of 660 pounds per hour, using a baghouse for control, identified as C-122

Note: The baghouse C-122 is a common control device used for the Cibec Mixer EU-123 and Banbury Mixer EU-122.

(p) One (1) rotary calcining kiln, approved for construction in 2013, identified as EU-101, with a maximum capacity of 3,000 lbs of iron oxide per hour, using a wet scrubber as control, and exhausting to stack S-101-2.

(q) One (1) rotary calcining kiln, approved for construction in 2013, identified as EU-102, with a maximum capacity of 3,500 lbs of iron oxide per hour, using a wet scrubber as control, and exhausting to stack S-101-2.

Note: Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron klinkers. The klinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

(r) One (1) Moritz Mill, approved for construction in 2013, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting indoors.

(s) One (1) Moritz Mill, approved for construction in 2013, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting indoors.

(t) One (1) Moritz Mill, approved for construction in 2013, identified as EU-154, with a maximum capacity of 2,380 lbs per hour, using a baghouse for control, identified as C-154, and exhausting indoors.

(u) One (1) twin banbury/extruder/mixer line, approved for construction in 2013, identified as EU-123, with a maximum capacity of 660 pounds per hour, using a baghouse for control, identified as C-122, consisting of the following:

(1) One (1) 275- liter capacity mixer, and

(2) Two (2) twin banbury extruders/mixers

Note 1: The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are tin chloride-halogentated activator, textile mordant, antioxidant (coba, BAS, special chem 4polymers), stearic acid, black concentrate, process oil, PP melt flow 6, phenolic resin in mineral oil, 40% extended EPDM, rubee grade zinc oxide, talc from imerys.

Note 2: The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123 and Banbury Mixer EU-122.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

In order to render the requirements of 326 IAC 2-2 not applicable, the PM emissions after control from each unit shall not exceed the following:

Control Device	Emission Units	PM Limitations (lb/hr)
Wet Scrubber (Stack S-101-2)	Rotary Calcining Kiln (EU-101)	11.35
	Rotary Calcining Kiln (EU-102)	
C-152 (exhausting indoors)	Moritz Mill (EU-152)	3.68
C-153 (exhausting indoors)	Moritz Mill (EU-153)	3.68
C-154 (exhausting indoors)	Moritz Mill (EU-154)	4.61
C-157 (exhausting indoors)	Weigh Hopper (EU-157)	0.02
C-122 (Stack S-122)	Banbury Mixer (EU-122)	0.60
	Twin Banbury/Extruder/Mixer Line (EU-123)	
C-156 (exhausting indoors)	Iron Oxide Silo (EU-103)	1.19
	Iron Oxide Silo (EU-105)	
	Weigh Hopper (EU-156)	

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

D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-2 not applicable, the PM10 and PM2.5 emissions after control from each unit shall not exceed the following:

Control Device	Emission Units	PM10 Limitations (lb/hr) (326 IAC 2-8)	PM2.5 Limitations (lb/hr) (326 IAC 2-8)
Wet Scrubber (Stack S-101-2)	Rotary Calcining Kiln (EU-101)	2.06	2.06
	Rotary Calcining Kiln (EU-102)		
C-152 (exhausting indoors)	Moritz Mill (EU-152)	3.68	3.68
C-153 (exhausting indoors)	Moritz Mill (EU-153)	3.68	3.68
C-154 (exhausting indoors)	Moritz Mill (EU-154)	4.61	4.61
C-157 (exhausting indoors)	Weigh Hopper (EU-157)	0.02	0.02
C-122 (Stack S-122)	Banbury Mixer (EU-122)	0.60	0.60
	Twin Banbury/Extruder/ Mixer Line (EU-123)		
C-156 (exhausting indoors)	Iron Oxide Silo (EU-103)	1.19	1.19
	Iron Oxide Silo (EU-105)		
	Weigh Hopper (EU-156)		

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

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

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

Emission Unit	Process Weight Rate (tons/hr)	PM Limitations (lb/hr)
Rotary Calcining Kiln (EU-101)	1.5	5.38
Rotary Calcining Kiln (EU-102)	1.75	5.97
Moritz Mill (EU-152)	0.85	3.68
Moritz Mill (EU-153)	0.85	3.68
Moritz Mill (EU-154)	1.19	4.61
Weigh Hopper (EU-156)	0.10	0.89
Weigh Hopper (EU-157)	0.44	2.35
Banbury Mixer (EU-122)	1.85	6.19
Twin Banbury/Extruder/ Mixer Line (EU-123)	0.33	1.95
Iron Oxide Silo (EU-103)	0.91	3.84
Iron Oxide Silo (EU-105)	0.91	3.84

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

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Particulate Control

(a) In order to comply with conditions D.1.1, D.1.2, and D.1.3, the wet scrubber for particulate control shall be in operation and control emissions from the rotary calcining kilns, identified as EU-101 and EU-102, at all times that the kilns are in operation.

(b) In order to comply with conditions D.1.1, D.1.2, and D.1.3, the baghouses for particulate control shall be in operation and control emissions from the Moritz Mills, identified as EU-152 through EU-154, the weigh hoppers, identified as EU-156 and EU-157, the silos, identified as EU-103 and EU-105, the Banbury Mixer, identified as EU-122, and the Twin Banbury/Extruder/ Mixer Line, identified as EU-123, at all times that these units are in operation.

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the Twin Banbury/Extruder/Mixer Line (EU-123), the Permittee shall conduct PM, PM10, and PM2.5 testing for the Banburry Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

(b) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the two rotary calcining kilns (EU-101 and EU-102), the Permittee shall conduct PM, PM10, and PM2.5 testing for each of the two rotary calcining kilns (EU-101 and EU-102), utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

(c) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of each of the Moritz Mills (EU-152, EU-153, and EU-154), and the Weigh Hopper EU-156, and Silos EU-103 and EU-105, the Permittee shall conduct PM, PM10, and PM2.5 testing for each of the Moritz Mills (EU-152, EU-153, and EU-154), and the Weigh Hopper EU-156 and Silos EU-103 and EU-105, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the Rotary Kilns, and Banbury Mixer and Twin Banbury/Extruder/Mixer stack exhausts (S-101-2 and S-122) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reporting required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the Banbury Mixer (EU-122) and the Twin Banbury/Extruder/Mixer Line (EU-123), the weigh hopper (EU-156) and sand silos (EU-103 and EU-105), weigh hopper (EU-157), and each of the Moritz Mills (EU-152, EU-153, and EU-154), at least once per day when the process is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.5 and 6.5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop and flow rate across the scrubber used in conjunction with the rotary calcining kilns, at least once per day when the kilns are in operation.

When for any one reading, the pressure drop across the scrubber is outside the normal range of 15 and 21 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

When for any one reading, the flow rate of any of the scrubbers is less than the minimum of 55 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

A pressure reading that is outside the above mention range or a flow rate that is below the above mentioned minimum is not a deviation from this permit, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

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

D.1.9 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.10 Scrubber Failure Detection

(a) For a scrubber controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a scrubber controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency

and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.11 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the Banbury mixer (EU-122) and the Twin Banbury/Extruder/Mixer Line (EU-123) and Rotary Kilns (EU-101 and EU-102) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.1.8(a), the Permittee shall maintain records of the pressure drop on the baghouses used in conjunction with the Banbury Mixer (EU-122), the Twin Banbury/Extruder/Mixer Line (EU-123), the weigh hopper (EU-156) and sand silos (EU-103 and EU-105), the weigh hopper (EU-157), and each of the Moritz Mills (EU-152, EU-153, EU-154) during normal operation. The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading, (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.1.8(b), the Permittee shall maintain daily records of the following operational parameters for the scrubber associated with the rotary calcining kilns during normal operation:

(1) pressure drop; and

(2) flow rate.

The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading (e.g., the process did not operate that day).

(d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(e) One (1) natural gas-fired Cleaver Brooks boiler, constructed in 1999, identified as EU-151, with a maximum heat input of 2.5 MMBtu per hour, exhausting to stack S-151.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the Cleaver Brooks boiler shall not exceed 0.86 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ Where Q = total source capacity (MMBtu/hr)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Ilpea Industries Inc.
Source Address: 1320 S. Main Street, Scottsburg, Indiana 47170
FESOP Permit No.: F143-32451-00018

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Ilpea Industries Inc.
Source Address: 1320 S. Main Street, Scottsburg, Indiana 47170
FESOP Permit No.: F143-32451-00018

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Source Name: Ilpea Industries Inc.
Source Address: 1320 S. Main Street, Scottsburg, Indiana 47170
FESOP Permit No.: F143-32451-00018

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Ilpea Industries Inc.**
Source Location:	**1320 S. Main Street, Scottsburg, Indiana 47170**
County:	**Scott**
SIC Code:	**3053 (Gaskets, Packaging and Sealing Devices)**
Operation Permit No.:	**F143-32451-00018**
Permit Reviewer:	**Nida Habeeb**

On June 29, 2013, the Office of Air Quality (OAQ) had a notice published in the Scott County Journal of Scottsburg, Indiana, stating that Ilpea Industries, Inc. had applied for a New Source Review and Federally Enforceable State Operating Permit Renewal to operate a source of a plastics and magnetic plastics manufacturing operation. The notice also stated that the OAQ proposed to issue a New Source Review and Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On June 20, 2013, Ilpea Industries, Inc submitted comments to IDEM, OAQ on the draft New Source Review and Federally Enforceable State Operating Permit Renewal.

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

Comment 1:

D.1.8 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the Banbury Mixer (EU-122) and the Twin Banbury/Extruder/Mixer Line (EU-123), the weigh hopper (EU-156) and sand silos (EU-103 and EU-105), weigh hopper (EU-157), and each of the Moritz Mills (EU-152, EU-153, and EU-154), at least once per day when the process is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between ~~3.0 and 6.0~~ **3.5 and 6.5** inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

Response to Comment 1:

IDEM agrees with the recommended changes. The permit has been revised as requested above.

Additional Changes

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

(a)

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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. **The analog instrument shall be capable of measuring values outside of the normal range.**

(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.

(b)

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, **where applicable**:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, **where applicable**:

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

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

IDEM Contact

(a) Questions regarding this proposed New Source Review and Federally Enforceable State Operating Permit Renewal can be directed to Nida Habeeb at the Indiana Department

Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317)-234-8531 or toll free at 1-800-451-6027 extension 4-8531.

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Ilpea Industries Inc.**
Source Location:	**1320 S. Main Street, Scottsburg, Indiana 47170**
County:	**Scott**
SIC Code:	**3053 (Gaskets, Packaging and Sealing Devices)** **3099 (Primary Metal Products, n.e.c.)**
Permit Renewal No.:	**F143-32451-00018**
Permit Reviewer:	**Nida Habeeb**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Ilpea Industries Inc. relating to the operation of a plastics and magnetic plastics manufacturing operation. On October 26, 2012, Ilpea Industries Inc. submitted an application to the OAQ requesting to renew its operating permit. Ilpea Industries Inc. (formerly Holm Industries) was issued its New Source Construction/FESOP No. F143-26143-00018 on July 17, 2008. In addition to the renewal, the source applied to construct and operate new emissions units that were permitted however never constructed within the allowed time frame.

The source was issued the initial permit in the name of Holm Industries Inc. and on July 24, 2009, and changed the name to Ilpea Industries Inc.

Source Location

Ilpea Industries, Inc. owns and operates two plants in Scottsburg. The two plants are about 4,000 feet apart.

(a) The corporation's main office, located at 745 S. Gardner Street, has a research and development extrusion plant. The Gardner Street plant has no air permit and no plant ID number.

(b) The second plant, plant ID 143-00018, is located at 1320 S. Main Street and makes extruded plastic parts.

IDEM, OAQ has examined whether these plants are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for two plants to be considered one major source, they must meet all three of the following criteria:

(1) the plants must be under common ownership or common control;

(2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for another; and,

(3) the plants must be located on contiguous or adjacent properties.

(1) common ownership or common control
Ilpea Industries, Inc. owns both plants. Therefore the plants are under common ownership, meeting the first part of the major source definition.

(2) Standard Industrial Classification (SIC) Code

The Standard Industrial Classification Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. Both plants have the two-digit SIC Code 30 for the Major Group Rubber and Miscellaneous Plastics Products.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. Neither plant sends any output to the other plant. The Gardner Street research and development plant does not test any dies or do any other work for the Main Street plant. It does research and development work for Ilpea's plants in other states. The Main Street plant does its own research and development work. However, since the plants have the same two-digit SIC Code the second part of the major source definition is met.

(3) contiguous or adjacent properties

The last part of the definition is whether the plants are on the same, contiguous or adjacent properties. The plants are not located on the same or contiguous properties. Therefore IDEM, OAQ must determine if the plants are located on adjacent properties.

The term "adjacent" is not defined in Indiana's rules. IDEM's nonrule policy document NPD Air-005 is guidance for applying the definition of "major source" in 326 IAC 2-1-7(22). NPD Air-005 adds the following guidance:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.

- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.

- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The U.S. EPA has a similar view on how to interpret the term "adjacent" when defining a source. Two U.S. EPA letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term "adjacent" as it is used in making major source determinations. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are "adjacent" going back to the preamble to the 1980 NSR program definition of "major source". U.S. EPA's consistent approach is that any evaluation of what is "adjacent" must relate to the guiding principal of a common sense notion of "source".

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

(1) Are materials routinely transferred between the plants?
(2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
(3) Is the production process itself split in any way between the plants?

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant, and whether the distance between them is small enough that it enables

them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA's view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plants are adjacent.

There are no materials transferred between the plants. The Gardner Street plant's environmental health and safety person travels to the Main Street plant on a monthly basis. The production process is not split between the two plants. The plants are about 4,000 feet apart. Considering all these factors, IDEM, OAQ finds that the plants are not located on adjacent properties and therefore do not meet the third part of the major source definition.

Conclusion:

The plants do not meet all three parts of the major source definition. Therefore, IDEM, OAQ finds that Ilpea Industries, Inc.'s plants at 745 S. Gardner Street and 1320 S. Main Street in Scottsburg are not part of the same major source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

Plastic Pellet Process

Note: The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

(a) Three (3) polyvinyl chloride silos, constructed in 1999, identified as EU-106, EU-107, and EU-108, with a maximum capacity of 7,950 tons per year each, for the storage of calcium carbonate, using a bin vent filter for control, and exhausting outdoors.

Note: The calcium carbonate material is vacuumed from a tanker to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate that can be used.

(b) One (1) Banbury mixer, constructed in 1999, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

Note: The baghouse C-122 is a common control device used for the Banbury Mixer EU-122 and the Cibec Mixer EU-123.

(c) One (1) plastic pellet production line, constructed in 1999, identified as EU-112, with a maximum capacity of 1,000 pounds per hour, no control and exhausting to stack S-112.

(d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.

(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-114, with a maximum capacity of 1,800 pounds per hour, no control and exhausting to stack S-114.

(f) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.

(g) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.

(h) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(i) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) One (1) natural gas-fired air make-up unit, constructed in 1999, identified as EU-119, with a maximum heat input of 1.1 MMBtu per hour, exhausting to stack S-119.

(b) Four (4) natural gas-fired space heaters, constructed in 1999, identified as EU-136, EU-141, EU-142, and EU-143, with a maximum heat input of 0.14 MMBtu per hour each, exhausting to stacks S-136, S-141, S-142, and S-143.

(c) Eight (8) natural gas-fired space heaters, constructed in 1999, identified as EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, and EU-147, with a maximum heat input of 0.25 MMBtu per hour each, exhausting to stacks S-137, S-138, S-139, S-140, S-144, S-145, S-146, and S-147.

(d) Two (2) natural gas-fired space heaters, constructed in 1999, identified as EU-148 and EU-149, with a maximum heat input of 0.40 MMBtu per hour each, exhausting to stacks S-148 and S-149.

(e) One (1) natural gas-fired Cleaver Brooks boiler, constructed in 1999, identified as EU-151, with a maximum heat input of 2.5 MMBtu per hour, exhausting to stack S-151.

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, and welding equipment.

(g) Repair activities, including the following: Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(h) Conveyors as follows: enclosed systems for conveying plastic raw materials and plastic finished goods.

(i) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines, purging of vessels.

(j) Blowdown for a cooling tower.

(k) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).

(l) Emissions from research and development activities as defined in 326 IAC 2-7-1(21)(D).

New Emission Units and Pollution Control Devices

The units listed below were originally approved for construction in 2008 and are listed in the current permit; however, because of the downturn in the economy, these units were never constructed. Since the units were never constructed, the following units are being considered as new in this permit: EU-101, EU-102, EU-152, EU-153, EU-154, EU-156 and EU-157.

The following is a list of the new emission unit(s) and pollution control device(s):

Powder Metal Process

(a) One (1) iron oxide silo, approved for construction in 2013, identified as EU-103, with a maximum throughput capacity of 7,000 tons per year, for the storage of iron oxide powder, equipped with a bin vent filter, and directly venting to a weigh hopper, identified as EU-156.

(b) One (1) iron oxide silo, approved for construction in 2013, identified as EU-105, with a maximum throughput capacity of 7,000 tons per year, for the storage of iron oxide powder, equipped with a bin vent filter, and directly venting to a weigh hopper, identified as EU-156.

(c) One (1) weigh hopper, approved for construction in 2013, identified as EU-156, with a maximum capacity of 4,930 lbs per day, using a baghouse for control, identified as C-156, exhausting indoors.

(d) One (1) weigh hopper, approved for construction in 2013, identified as EU-157, with a maximum capacity of 870 lbs per hour, using a baghouse for control, identified as C-157 and exhausting indoors.

(e) One (1) Cibec Mixer , approved for construction in 2013, identified as EU-123, with a maximum capacity of 660 pounds per hour, using a baghouse for control, identified as C-122

Note: The baghouse C-122 is a common control device used for the Cibec Mixer EU-123 and Banbury Mixer EU-122.

(f) One (1) rotary calcining kiln, approved for construction in 2013, identified as EU-101, with a maximum capacity of 3,000 lbs of iron oxide per hour, using a wet scrubber as control, and exhausting to stack S-101-2.

(g) One (1) rotary calcining kiln, approved for construction in 2013, identified as EU-102, with a maximum capacity of 3,500 lbs of iron oxide per hour, using a wet scrubber as control, and exhausting to stack S-101-2.

Note: Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron klinkers. The klinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

(h) One (1) Moritz Mill, approved for construction in 2013, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting indoors.

(i) One (1) Moritz Mill, approved for construction in 2013, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting indoors.

(j) One (1) Moritz Mill, approved for construction in 2013, identified as EU-154, with a maximum capacity of 2,380 lbs per hour, using a baghouse for control, identified as C-154, and exhausting indoors.

In this renewal the source is also adding two new units to be constructed that were not included in the previous permit approvals:

(k) One (1) twin banbury/extruder/mixer line, approved for construction in 2013, identified as EU-123, with a maximum capacity of 660 pounds per hour, using a baghouse for control, identified as C-122, consisting of the following:

(1) One (1) 275- liter capacity mixer, and

(2) Two (2) twin banbury extruders/mixers

Note 1: The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are tin chloride-halogentated activator, textile mordant, antioxidant (coba, BAS, special chem 4polymers), stearic acid, black concentrate, process oil, PP melt flow 6, phenolic resin in mineral oil, 40% extended EPDM, rubee grade zinc oxide, talc from imerys.

Note 2: The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123 and Banbury Mixer EU-122.

(l) One (1) plastic pellet production line, identified as EU-119, approved for construction in 2013, maximum capacity of 600.00 pound per hour, no control, and exhausting indoors.

The source is also adding the following insignificant activity with this renewal:

(m) One (1) natural gas evaporator, identified as EU-124, approved for construction in 2013, with a maximum heat input rate of 0.95 MMBtu per hour.

Emission Units and Pollution Control Equipment Removed From the Source

The source has not removed emission units during this review period.

Existing Approvals

Since the issuance of the FESOP No. 143-26143-00018 on July 17, 2008, the source has not been issued additional approvals. The source constructed some but not all of the permitted emission units in FESOP No. 143-26143-00018. Emission units that were never constructed in 2008 are being considered new with this renewal.

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

Enforcement Issue

In accordance with 326 IAC 2-8-3(h), a timely renewal application is one that is submitted at least nine (9) months prior to the expiration date of the source's existing operating permit. This

source's existing permit expires on July 17, 2013. The source's permit renewal application was not received by IDEM until October 26, 2012. IDEM is reviewing this matter and will take appropriate action.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Scott 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 (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Scott County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Scott County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM10 and PM2.5 emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year.

(d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Rotary Kilns-Process Emissions - EU-101 (wet scrubber)/S-101-2	49.71	9.02	9.02	0.00	0.00	0.00	0.00	0.00	0.76	0.71 HCl
Rotary Kilns-Process Emissions - EU-102 (wet scrubber)/S-101-2									0.88	0.82 HCl
Weigh Hopper - EU-157	0.09	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-156	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-103										
Silo - EU-105										
Silo - EU-106	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-107	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-152 and EU-153	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mill - EU-154	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-112	0.07	0.07	0.07	0.00	0.00	0.66	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-114	0.13	0.13	0.13	0.00	0.00	1.18	0.00	0.00	0.00	
Plastic Pellet Production Line -EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	
Plastic Pellet Production Line -EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	
Plastic Pellet Production Line -EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	
Plastic Pellet Production Line -EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	
Plastic Pellet Production Line -EU-119	0.04	0.04	0.04	0.00	0.00	0.39	0.00	0.00	0.00	
Banbury Mixer- EU-122	2.63	2.63	2.63	0.00	0.00	0.00	0.00	0.00	0.00	
Twin Banbury/Extruder Mixer Line EU-123										
Rotary Kilns - Natural Gas Combustion -EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	10,368.60	0.16	0.15 Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148, EU-149 and EU-151	0.06	0.23	0.23	0.02	2.99	0.16	2.51	3,608.27	0.06	0.05 Hexane
Natural Gas Evaporator	0.01	0.03	0.03	0.00	0.41	0.02	0.34	492.51	0.01	0.01 Hexane
Total PTE of Entire Source	**111.91**	**71.91**	**71.91**	**0.07**	**11.98**	**6.90**	**10.07**	**14,469.38**	**1.86**	**1.53 HCl**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.

FESOP STATUS

(a) This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels.

In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

(b) The potential to emit of PM10 and PM2.5 from this facility is greater than one hundred (100) tons per year. The Permittee has elected to limit the potential to emit of this source as follows:

Pursuant to 326 IAC 2-8, the facilities shall not exceed the following pound per hour limitations.

Control Device	Emission Units	PM10 Limitations (lb/hr) (326 IAC 2-8)	PM2.5 Limitations (lb/hr) (326 IAC 2-8)
Wet Scrubber (Stack S-101-2) [a]	Rotary Kiln (EU-101)	2.06	2.06
	Rotary Kiln (EU-102)		
C-152 (exhausting indoors) [b]	Moritz Mill (EU-152)	3.68	3.68
C-153 (exhausting indoors) [b]	Moritz Mill (EU-153)	3.68	3.68
C-154 (exhausting indoors) [b]	Moritz Mill (EU-154)	4.61	4.61
C-157 (exhausting indoors) [c]	Weigh Hopper (EU-157)	0.02	0.02
C-122 (Stack S-122) [d]	Banbury Mixer (EU-122)	0.60	0.60
	Twin Banbury/Extruder/ Mixer Line (EU-123)		
C-156 (exhausting indoors) [e]	Silo (EU-103)	1.19	1.19
	Silo (EU-105)		
	Weigh Hopper (EU-156)		

(a) The existing permit specifies each limit for the rotary kiln. Since both rotary kilns exhaust to a common control, the existing limits have been combined to equal a single limit.

Based on controlled PM10 and PM2.5 emissions using the wet scrubber, the kilns (EU-101 and EU-102) can meet the PM10 and PM2.5 limitations.

(b) These limits did not change in this renewal.

(c) This is a new limit in this renewal.

Based on the controlled PM10 and PM2.5 emissions using the baghouses (C-152, C-153, and C-154), the Moritz Mills (EU-152, EU-153, and EU-154) can meet the PM10 and PM2.5 limitations.

(d) The previous FESOP emission limit for the existing Banbury Mixer was 6.19 lbs/hr, which was equivalent to the allowable lbs/hr emission limitation under 326 IAC 6-3-2. With the addition of new units in this renewal, the FESOP limits needed to be lowered to accommodate the emissions from the new units.

Based on the controlled PM10 and PM2.5 emissions using the baghouse (C-122), the Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123) can meet the PM10 and PM2.5 limitations. See Appendix A for detailed emissions calculations.

(e) This replaces the existing limit for the Weigh Hopper (EU-156) since there are silos also exhausting to the same control.

Based on the controlled PM10 and PM2.5 emissions using the baghouses (C-156 and C-157), the Weigh Hoppers (EU-156 and EU-157) and the Silos (EU-103 and EU-105) can meet the PM10 and PM2.5 limitations.

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

These are revised limits in this renewal. This is a Title 1 change.

326 IAC 2-2 (PSD)

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM, PM10, and PM2.5 is limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Since the unrestricted potential to emit of this source is greater than two hundred fifty (250) tons per year of PM, the Permittee has elected to limit the potential to emit of this source as follows:

Control Device	Emission Units	PM Limitations (lb/hr)
Wet Scrubber (Stack S-101-2)	Rotary Kiln (EU-101)	11.35
	Rotary Kiln (EU-102)	
C-152 (exhausting indoors)	Moritz Mill (EU-152)	3.68
C-153 (exhausting indoors)	Moritz Mill (EU-153)	3.68
C-154 (exhausting indoors)	Moritz Mill (EU-154)	4.61
C-157 (exhausting indoors)	Weigh Hopper (EU-157)	0.02
C-122 (Stack S-122)	Banbury Mixer (EU-122)	0.60
	Twin Banbury/Extruder/ Mixer Line (EU-123)	
C-156 (exhausting indoors)	Silo (EU-103)	1.19
	Silo (EU-105)	
	Weigh Hopper (EU-156)	

These are revised limits in this renewal. This is a Title I change.

Based on the controlled PM emissions from each of these units, the source can comply with these emissions limitations. See Appendix A for detailed emissions calculations.

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

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS)

(a) The Cleaver Brooks natural gas-fired boiler is not subject to the requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40c, Subpart Dc), because the heat input of the boiler is less than 10 MMBtu per hour.

(b) This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart DDD (60.560 through 60.566), Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry, because this source does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) as defined in 40 CFR 60.561. This source manufactures plastic extrusions from purchased plastic resin pellets under SIC Code 3053 and does not manufacture synthetic resins through predominantly chemical processes (e.g., SIC Codes 2821 and 2824).

(c) This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart III (60.610 through 60.617), Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes, because this source does not produce any of the compounds or chemicals listed in 40 CFR 60.617 (as a product, co-product, by-product, or intermediate) for sale as a final product as that chemical, or for use in the production of other chemicals or compounds.

(d) The two rotary calciner kilns are not subject to the requirements of the New Source Performance Standard for Calciners and Dryers in Mineral Industries, 40 CFR 60.730, Subpart UUU), because this facility does not meet the definition of a mineral processing plant as defined under 40 CFR 60.731.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) This source is not subject to the following NESHAPs, because this source is not a major source of HAPs and this source primarily engages in manufactures rubber and plastic extrusions from purchased rubber stock and plastic resin pellets under SIC Code 3053 and does not manufacture chemicals.

(1) 40 CFR 63 Subpart F (63.100 through 63.107), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry (326 IAC 20-11-1)

(2) 40 CFR 63 Subpart G (63.110 through 63.153), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (326 IAC 20-11-1)

(3) 40 CFR 63 Subpart H (63.160 through 63.183), NESHAPs: Organic Hazardous Air Pollutants for Equipment Leaks (326 IAC 20-11-1)

(4) 40 CFR 63 Subpart I (63.190 through 63.193), NESHAPs: Certain Processes Subject to the Negotiated Regulation for Equipment Leaks (326 IAC 20-12-1)

(b) This source is not subject to the requirements of 40 CFR 63 Subpart J (63.210 through 63.217) - NESHAPs: Polyvinyl Chloride and Copolymers Production (326 IAC 20-69-1), because this source is not a PVC plant (i.e., is not a plant where vinyl chloride alone or in combination with other materials is polymerized; 40 CFR 61.61(c)) and is not a major source of HAPs.

(c) This source is not subject to the requirements of 40 CFR 63 Subpart U (63.480 through 63.507) NESHAP Emission: Group I Polymers and Resins (326 IAC 20-19-1), because this source is not a major source of HAPs.

(d) This source is not subject to the requirements of 40 CFR 63 Subpart W (63.520 through 63.529) NESHAPs: Group II Polymers and Resins, Epoxy Resins Production and Non-Nylon Polyamides Production (326 IAC 20-20-1), because this source is not a major source of HAPs.

(e) This source is not subject to the requirements of 40 CFR 63 Subpart OOO (63.1400 through 63.1419) NESHAPs: Group III Polymers and Resins (326 IAC 20-58-1), because this source is not a major source of HAPs.

(f) This source is not subject to the requirements of 40 CFR 63 Subpart JJJ (63.1310 through 63.1335) NESHAP Emissions: Group IV Polymers and Resins (326 IAC 20-21-1), because the source is not a major source of HAPs and only performs finishing processes, which are specifically exempt from the requirements of this rule under 40 CFR 63.1310(d).

(g) This source is not subject to the requirements of 40 CFR 63 Subpart YY (63.1100 through 63.1114) - NESHAPs for Source Categories: Generic Maximum Achievable Control Technology Standards (326 IAC 20-44-1), because this source is not one of the source categories or affected sources specified in 40 CFR 63.1103(a) through (h). This source manufactures plastics and magnetic plastics from purchased plastic resin pellets.

(h) This source is not subject to the requirements of the 40 CFR 63, Subpart III (40 CFR Part 63.1290 - 63.1309) - NESHAPs: Flexible Polyurethane Foam Production (326 IAC 20-22-1), because the source does not produce flexible polyurethane or rebond foam as defined by 40 CFR 63.1292.

(i) This source is not subject to the requirements of 40 CFR 63, Subpart PPP (60.1420 through 60.1439), NESHAP for Polyether Polyols Production (326 IAC 20-59-1), because this source does not manufacture a polyether polyol.

(j) This source is not subject to the requirements of 40 CFR 63 Subpart WWWW (63.5780 through 63.5935) - NESHAPs: Reinforced Plastic Composites Production (326 IAC 20-25-1), because this source is not a major source of HAPs.

(k) This source is not subject to the requirements of 40 CFR 63, Subpart DDDDD, (63.7480 through 63.7575), NESHAPs for Industrial, Commercial, and Institutional Boilers and Process Heaters, because the source is not a major source of HAPs.

(l) This source is not subject to the requirements of 40 CFR 63 Subpart MMMMM (63.8780 through 63.8830) - NESHAPs: Flexible Polyurethane Foam Fabrication Operation (326 IAC 20-66-1), because this source does not perform fabrication of flexible polyurethane foam as defined by 40 CFR 63.8782.

(m) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X)), are not included for this proposed renewal, because, although this source's SIC Code (Primary Metal Products Manufacturing) is listed, it does not have the potential to emit metal fabrication or finishing metal HAP (MFHAP), as defined in 40 CFR 63.11514(b).

(n) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

(a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of this magnetic plastics production facility will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

(e) 326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

State Rule Applicability – Individual Facilities

Rotary Calcining Kilns

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

(1) Pursuant to 326 IAC 6-3-2, the particulate emissions from the one (1) rotary calcining kiln, identified as EU-101, shall not exceed 5.38 pounds per hour when operating at a process weight rate of 1.5 tons per hour.

(2) Pursuant to 326 IAC 6-3-2, the particulate emissions from the one (1) rotary calcining kiln, identified as EU-102, shall not exceed 5.97 pounds per hour when operating at a process weight rate of 1.75 tons per hour.

The pound per hour limitations were calculated with the following equation:

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

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

Based on Appendix A - Emissions Calculations, the unlimited potential to emit of the rotary calcining kiln (EU-101) is 195.00 pounds per hour before control. The unlimited potential to emit of the rotary calcining kiln (EU-102) is 227.50 pounds per hour before control.

The wet scrubber (C-101-2) shall be in operation at all times the rotary calcining kilns (EU-101 and EU-102) are in operation, in order to comply with this limit.

Moritz Mills

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

(1) Pursuant to 326 IAC 6-3-2, the particulate emissions from the Moritz Mills, identified as EU-152 and EU-153, shall each not exceed 3.68 pounds per hour when operating at a process weight rate of 0.85 tons per hour, each.

(2) Pursuant to 326 IAC 6-3-2, the particulate emissions from the Moritz Mill, identified as EU-154, shall not exceed 4.61 pounds per hour when operating at a process weight rate of 1.19 tons per hour.

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

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

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

Based on Appendix A - Emissions Calculations, the unlimited potential to emit of the Moritz Mill Eu-152 is 25.0 pounds per hour before control. The unlimited potential to emit of the Moritz Mill EU-153 is 25.0 pounds per hour before control. The unlimited potential to emit of the Moritz Mill EU-154 is 35.0 pounds per hour before control.

The baghouses, identified as C-152, C-153, and C-154 shall be in operation at all times the three (3) Moritz Mills, identified as EU-152, EU-153, and EU-154 are in operation, in order to comply with this limit.

Banbury Mixers

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

(1) Pursuant to 326 IAC 6-3-2, the particulate emissions from the Banbury Mixer, identified as EU-122, shall not exceed 6.19 pounds per hour when operating at a process weight rate of 1.85 tons per hour.

(2) Pursuant to 326 IAC 6-3-2, the particulate emissions from the Twin Banbury/Extruder/Mixer Line, identified as EU-123, shall not exceed 1.95 pounds per hour when operating at a process weight rate of 0.33 tons per hour.

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

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

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

Based on Appendix A - Emissions Calculations, the unlimited potential to emit of the Banbury Mixer (EU-122) is 48.10 pounds per hour before control. The unlimited potential to emit of the Twin Banbury/Extruder/Mixer Line (EU-123) is 8.58 pounds per hour before control

The baghouse, identified as C-122, shall be in operation at all times the Banbury Mixer, identified as EU-122, and the Twin Banbury/Extruder/Mixer Line (EU-123) is in operation, in order to comply with this limit.

Plastic Pellet Production

(d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The plastic pellet production lines, identified as EU-112 through EU-119, are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because the potential to emit particulate from each unit is less than five-hundred fifty thousandths (0.551) pound per hour. Therefore, these units are exempt under 326 IAC 6-3-1(b)(14).

(e) 326 IAC 8 (VOC Rules)
There are no VOC Rules applicable to the plastic pellet production lines.

Materials Handling

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

(1) Pursuant to 326 IAC 6-3-2, the particulate emissions from the weigh hopper, identified as EU-156, shall not exceed 0.89 pounds per hour when operating at a process weight rate of 0.10 tons per hour.

(2) Pursuant to 326 IAC 6-3-2, the particulate emissions from the weigh hopper, identified as EU-157, shall not exceed 2.35 pounds per hour when operating at a process weight rate of 0.44 tons per hour.

(3) Pursuant to 326 IAC 6-3-2, the particulate emissions from each of the silos, identified as EU-103 and EU-105, shall not exceed 3.84 pounds per hour, each, when operating at a process weight rate of 0.91 tons per hour, each.

(4) The Silos identified as EU-106, EU-107, and EU-108 are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because the potential to emit particulate from each unit is less than five-hundred fifty thousandths (0.551) pound per hour. Therefore, these units are exempt under 326 IAC 6-3-1(b)(14).

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

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

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

Based on Appendix A - Emissions Calculations, the unlimited potential to emit of the weigh hopper EU-156 is 29.40 pounds per hour before control. The unlimited potential to emit of the weigh hopper EU-157 is 0.90 pounds per hour before control.

The baghouse, identified as C-156, shall be in operation at all times the weigh hopper, identified as EU-156 is in operation, in order to comply with these limits. Weigh Hopper EU-157 is able to comply with this emission limitation before control.

Based on Appendix A - Emissions Calculations, the unlimited potential to emit of the silos, identified as EU-103 and EU-105, is 14.85 pounds per hour, each. The baghouse, identified as C-156, shall be in operation and control emissions at all times the silos, identified as EU-103 and EU-105 are in operation, in order to comply with these limits.

Natural Gas Combustion

(g) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

(1) The two (2) rotary calcining kilns combustion units, identified as EU-101 and EU-102, are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because these units are not sources of indirect heating.

(2) The natural gas-fired heaters are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

(3) The natural gas-fired Cleaver Brooks boiler, identified as EU-151, is subject to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d)), because the boiler was constructed after September 21, 1983 and is a source of indirect heating. Pursuant to 326 IAC 6-2-4, the PM emissions from EU-151 shall not exceed 0.86 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$Pt = \frac{1.09}{Q^{0.26}}$ Where Q = total source capacity (MMBtu/hr)

For these units, Q = 2.5 MMBtu/hr. Therefore,

$$Pt = \frac{1.09}{(2.5)^{0.26}} = 0.86 \text{ lb/MMBtu}$$

Based on emission calculations, the natural gas-fired boiler can meet this limit without control. See Appendix A.

(h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired Cleaver Brooks boiler (identified as unit EU-151), air make-up unit, identified as unit EU-119, and the fourteen (14) natural-gas fired heaters, identified as units EU-136 through EU-149, are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(i) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

(j) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The natural gas-fired combustion units are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because they each have the potential to emit VOC of less than twenty five (25) tons per year.

(k) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired combustion units are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.

(l) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Insignificant Activities

(m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The insignificant cutting torches, soldering, and welding equipment are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because the potential to emit of particulate from these units is less than five-hundred fifty thousandths (0.551) pound per hour each. Therefore, these units are exempt under 326 IAC 6-3-1(b)(14).

Compliance Determination and Monitoring Requirements

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

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

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

(1) The Rotary Calcining Kilns (EU-101 and EU-102 have applicable compliance monitoring conditions as specified below:

Emission Unit	Control Device	Operating Parameters	Range	Frequency
Rotary Calcining Kilns (EU-101 and EU-102)	Wet Scrubber (Stack S-101-2)	Pressure Drop	15 to 21 inches	Once per day
		Flow rate	<55 gallons per minute	Once per day

These monitoring conditions are necessary because the wet scrubber for the rotary calcining kilns (EU-101 and EU-102) must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration, 326 IAC 2-8 (FESOP), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(2) The Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123) have applicable compliance monitoring conditions as specified below:

Emission Unit	Control Device	Operating Parameters	Range	Frequency
Banbury Mixer (EU-122) and Twin Banbury/Extruder/ Mixer Line (EU-123)	Baghouse C-122 (Stack S-122)	Visible Emissions	Normal Abnormal	Once per day
		Pressure Drop	3.0 and 6.0 inches of water	Once per day

These monitoring conditions are necessary because the baghouse C-122 must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration, 326 IAC 2-8 (FESOP), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(3) The Mortiz Mills (EU-152, EU-153, and EU-154) have applicable compliance monitoring conditions as specified below:

Emission Unit	Control Device	Operating Parameters	Range	Frequency
Mortiz Mills (EU-152 and EU-153)	Baghouses C-152 and C-153 (exhausting indoors)	Pressure Drop	3.0 and 6.0 inches of water	Once per day
Mortiz Mill (EU-154)	Baghouse C-154 (exhausting indoors)	Pressure Drop	3.0 and 6.0 inches of water	Once per day

These monitoring conditions are necessary because the baghouses for the Moritz Mills (EU-152, EU-153, EU-154) must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration, 326 IAC 2-8 (FESOP), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(4) The weigh hoppers (EU-156 and EU-157) and silos (EU-103 and EU-105) have applicable compliance monitoring conditions as specified below:

Emission Unit	Control Device	Operating Parameters	Range	Frequency
Weigh hopper (EU-156) and Silos (EU-103 and EU-105)	Baghouse C-156 (exhausting indoors)	Pressure Drop	3.0 and 6.0 inches of water	Once per day
Weigh hopper (EU-157)	Baghouse C-157 (exhausting indoors)	Pressure Drop	3.0 and 6.0 inches of water	Once per day

These monitoring conditions are necessary because the baghouse (C-156) for the weigh hopper (EU-156) and silos (EU-103 and EU-105) must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration, 326 IAC 2-8 (FESOP), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). The baghouse for the weigh hopper (EU-157) must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration and 326 IAC 2-8 (FESOP).

(b) The testing requirements applicable to this source are as follows:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing
Rotary Calcining Kiln EU-101 and Rotary Calcining Kiln EU-102	wet scrubber	180 days from startup	PM, PM10 and PM2.5	once every 5 years
Banbury Mixer EU-122 and Twin Banbury/Extruder/Mixer Line (EU-123)	Baghouse C-122	180 days from startup of EU-123, since they are both exhausting to the same control	PM, PM10 and PM2.5	Once every 5 years
Mortiz Mill EU-152	Baghouse C-152	180 days from startup	PM, PM10 and PM2.5	Once every 5 years
Mortiz Mill EU-153	Baghouse C-153	180 days from startup	PM, PM10 and PM2.5	Once every 5 years
Mortiz Mill EU-154	Baghouse C-154	180 days from startup	PM, PM10 and PM2.5	Once every 5 years
Weigh Hopper EU-156 and Silo EU-103 and Silo EU-105	Baghouse C-156	180 days from startup	PM, PM10 and PM2.5	Once every 5 years

Recommendation

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

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

An application for the purposes of this review was received on October 26, 2012. Additional information was received on November 2, 2012 and February 13, 2013.

Conclusion

The operation of this stationary plastics and magnetic plastics manufacturing operation shall be subject to the conditions of the attached FESOP Renewal No. 143-32451-00018.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Nida Habeeb at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-8531 or toll free at 1-800-451-6027 extension 4-8531.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

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

Appendix A: Emissions Calculations
Summary

Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

Unlimited PTE											
	PM (tons/yr)	PM_{10} (tons/yr)	PM2.5 (tons/yr)	SO_2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHG as CO2e (tons/yr)	Total HAPs (tons/yr)	Single HAPs (tons/yr)	Worst Single HAP
Emission Unit											
Rotary Kilns-Process Emissions - EU-101	854.10	203.67	203.67	0.00	0.00	0.00	0.00	0.00	0.76	0.71	HCl
Rotary Kilns-Process Emissions - EU-102	996.45	237.62	237.62	0.00	0.00	0.00	0.00	0.00	0.88	0.82	HCl
Silo - EU-103	65.04	65.04	65.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-105	65.04	65.04	65.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-106	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-107	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-152	109.50	109.50	109.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-153	109.50	109.50	109.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mill - EU-154	153.30	153.30	153.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-156	130.07	130.07	130.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-157	3.98	3.98	3.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-112	0.07	0.07	0.07	0.00	0.00	0.66	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-114	0.13	0.13	0.13	0.00	0.00	1.18	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-119	0.04	0.04	0.04	0.00	0.00	0.39	0.00	0.00	0.00	0.00	
Banbury Mixer- EU-122	210.68	210.68	210.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Twin Banbury/Extruder Mixer Line - EU-123	37.58	39.03	39.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Rotary Kilns-Natural Gas Combustion - EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	10,368.60	0.16	0.15	Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148 , EU-149 and EU-151	0.06	0.23	0.23	0.02	2.99	0.16	2.51	3,608.27	0.06	0.05	Hexane
Evaporator - EU-124	0.01	0.03	0.03	0.00	0.41	0.02	0.34	492.51	0.01	0.01	Hexane
Total Emissions	**2,737.08**	**1,329.95**	**1,329.95**	**0.07**	**11.98**	**6.90**	**10.07**	**14,469.38**	**1.86**	**1.53**	**HCl**

Appendix A: Emissions Calculations
Summary

Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

Controlled PTE											
	PM (tons/yr)	PM_{10} (tons/yr)	PM2.5 (tons/yr)	SO_2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHG as CO2e (tons/yr)	Total HAPs (tons/yr)	Single HAPs (tons/yr)	Worst Single HAP
Emission Unit											
Rotary Kilns-Process Emissions - EU-101	1.83	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.15	0.14	HCl
Rotary Kilns-Process Emissions - EU-102	8.97	2.14	2.14	0.00	0.00	0.00	0.00	0.00	0.17	0.16	HCl
Silo - EU-103	0.65	0.65	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-105	0.65	0.65	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-106	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-107	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-152	1.10	1.10	1.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-153	1.10	1.10	1.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mill - EU-154	1.53	1.53	1.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-156	1.30	1.30	1.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-157	0.04	0.04	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-112	0.07	0.07	0.07	0.00	0.00	0.66	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-114	0.13	0.13	0.13	0.00	0.00	1.18	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-119	0.04	0.04	0.04	0.00	0.00	0.39	0.00	0.00	0.00	0.00	
Banbury Mixer- EU-122	2.11	2.11	2.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Twin Banbury/Extruder Mixer Line - EU-123	0.39	0.39	0.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Rotary Kilns-Natural Gas Combustion - EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	10,368.60	0.16	0.15	Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148 , EU-149 and EU-151	0.06	0.23	0.23	0.02	2.99	0.16	2.51	3,608.27	0.06	0.05	Hexane
Evaporator - EU-124	0.01	0.03	0.03	0.00	0.41	0.02	0.34	492.51	0.01	0.01	Hexane
Total Emissions	**21.51**	**13.54**	**13.54**	**0.07**	**11.98**	**6.90**	**10.07**	**14,469.38**	**0.55**	**0.31**	**HCl**

Controlled PTE includes the potential to emit following the use of pollution control devices, including the baghouses and wet scrubber associated with these operations.

Appendix A: Emissions Calculations
Summary

Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

Limited PTE											
	PM (tons/yr)	PM_{10} (tons/yr)	PM2.5 (tons/yr)	SO_2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHG as CO2e (tons/yr)	Total HAPs (tons/yr)	Single HAPs (tons/yr)	Worst Single HAP
Emission Unit											
Rotary Kilns-Process Emissions - EU-101	49.71	9.02	9.02	0.00	0.00	0.00	0.00	0.00	0.76	0.71	HCl
Rotary Kilns-Process Emissions - EU-102									0.88	0.82	HCl
Weigh Hopper - EU-157	0.09	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-156	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-103											
Silo - EU-105											
Silo - EU-106	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-107	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-152	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-153	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mill - EU-154	20.19	20.19	20.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-112	0.07	0.07	0.07	0.00	0.00	0.66	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-114	0.13	0.13	0.13	0.00	0.00	1.18	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-119	0.04	0.04	0.04	0.00	0.00	0.39	0.00	0.00	0.00	0.00	
Banbury Mixer- EU-122	2.63	2.63	2.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Twin Banbury/Extruder Mixer Line - EU-123											
Rotary Kilns-Natural Gas Combustion - EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	10,368.60	0.16	0.15	Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-	0.06	0.23	0.23	0.02	2.99	0.16	2.51	3,608.27	0.06	0.05	Hexane
Evaporator - EU-124	0.01	0.03	0.03	0.00	0.41	0.02	0.34	492.51	0.01	0.01	Hexane
Total Emissions	**111.91**	**71.91**	**71.91**	**0.07**	**11.98**	**6.90**	**10.07**	**14,469.38**	**1.86**	**1.53**	**HCl**

Limited PTE is the potential to emit of each unit based on the limits provided in this FESOP under 326 IAC 2-8 and 326 IAC 2-2.

Appendix A: Emissions Calculations
Process Emissions
Two (2) rotary calcining kilns

Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

Kiln #1 (EU-101)

Maximum Capacity lb/hr	Annual Throughput ton/yr	Particulate Control	HCl Control Efficiency %	Cl Control Efficiency %
3,000	13,140	99.1%	80.0%	95.00%

	Unlimited PTE							
	PM	PM10	HCl (stack test, lb/hr)	Cl (stack test, lb/hr)	**Controlled PM**	**Controlled PM10**	**Controlled HCl**	**Controlled Cl**
Emission Factor in lb/ton	130.0	31.0	0.13	0.01				
Potential Emission in tons/yr	854	204	0.71	0.05	1.83	0.02	0.14	0.01

Kiln#2 (EU-102)

Maximum Capacity lb/hr	Annual Throughput ton/yr	Particulate Control Efficiency (%)
3,500	15,330	99.1%

	Unlimited PTE							
	PM	PM10	HCl (stack test, lb/hr)	Cl (stack test, lb/hr)	**Controlled PM**	**Controlled PM10**	**Controlled HCl**	**Controlled Cl**
Emission Factor in lb/ton	130.0	31.0	0.15	0.01				
Potential Emission in tons/yr	996.45	237.62	0.82	0.05	8.97	2.14	0.16	0.003

*Emission factors for PM and PM10 are from AP-42, Chapter 11.6, Table 11.6.2. HCL and Cl emission factors are based from stack test data from the equipment in use at its previous facility.
* Assume PM10 = PM2.5

Methodology
Potential to Emit PM/PM10(tons/yr) = Annual Throughput (ton/yr) x Emission Factor (lb/ton) x 1 ton /2,000 lb
Potential to Emit HCl (tons/yr) = Collected by Scrubber (tons/yr) / Control Efficiency (%)

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID#	Maximum capacity of Rotary Kiln	Process Weight Rate	Allowable PM Emissions	Allowable PM Emissions	Unlimited PM emissions
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)	(lbs/hr)
EU-101	3,000	1.50	5.38	23.56	195
EU-102	3,500	1.75	5.97	26.13	227.5

FESOP and PSD Minor Limits			
Limited PM Emissions	Limited PM Emissions	Limited PM10/PM2.5	Limited PM10/PM2.5
(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
5.38	23.56	1.03	4.51
5.97	26.15	1.03	4.51
		Total	9.02

Notes for the Rotary Kilns: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

Appendix A: Emissions Calculations
Particulate Emissions from Silos

Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

							FESOP and PSD Minor limits	
Unit ID	Process	Amount PM/PM10 Collected (lb/hr)*	Uncontrolled Particulate Emissions (ton/yr)	Uncontrolled Particulate Emissions (lb/hr)	Control Efficiency (%)	Controlled Particulate Emissions PM/PM10/ PM2.5 (ton/yr)	Limited PM/PM10/ PM2.5 (lbs/hr)	Limited PM/PM10/ PM2.5 (tons/yr)
EU-103	Iron Oxide	14.7	65.04	14.85	99.00%	0.65	0.15	0.65
EU-105	Iron Oxide	14.7	65.04	14.85	99.00%	0.65	0.15	0.65
			130.07			**1.30**		

*These units directly vent to Weigh Hopper EU-156, and all units are controlled by baghouse C-156.

Methodology
Uncontrolled PM/PM10 Emissions (ton/yr) = Amount Collected (lb/hr) / (Control Efficiency %) * 8760 hr/yr * 1 ton/2000 lbs
Controlled PM/PM10 Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) * (1 - Control Efficiency %)

Unit ID	Process	Maximum Throughput (tons/year)	PM/PM10/PM2.5 Emission Factor (lb/ton)	PTE PM/PM10/PM2.5 (lb/hr)	PTE PM/PM10/PM2.5 (tons/yr)
EU-106	Polyvinyl Chloride	5565.00	**0.10**	0.06	0.28
EU-107	Polyvinyl Chloride	5565.00	**0.10**	0.06	0.28
EU-108	Calcium Carbonate	7950.00	**0.10**	0.09	0.40
					0.95

*Emission factors are from Fire 6.25, for SCC 3-05-007-07, cement manufacturing, unloading raw materials.
sume PM10 = PM2.5

Methodology
PTE PM/PM10 (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2000 lbs

	Allowable PM emissions under 326 IAC 6-3-2				
Unit ID	Process	Maximum Throughput (tons/year)	Maximum Throughput / Process Weight Rate (tons/hr)	Allowable PM Emissions (lb/hr)	Unlimited PM emissions (lb/hr)
EU-103	Iron Oxide	7950	0.91	3.84	14.85
EU-105	Iron Oxide	7950	0.91	3.84	14.85

Methodology
Maximum Throughput / Process Weight Rate (tons/hr) = Maximum Throughput (tons/year) / 8,760 hrs/year
Interpolation of the data in this table for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation: E = 4.10 * P^0.67

Appendix A: Emissions Calculations
Process Emissions
Three (3) Moritiz Mills

Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

Moritz Mills (EU-152 & EU-153)

Maximum Capacity lb/hr Total of both	Annual Throughput ton/yr	Control Efficiency
3,400	14,892	99.0%

	PM	PM10	
Emission Factor in lb/hr	25.0	25.0	**Controlled PM/PM10**
Potential Emission in tons/yr	**110**	**110**	**1.10**
Potential Emission for 2 Mills (tons/yr):	**219**	**219**	**2.19**

Moritz Mills (EU-154)

Maximum Capacity lb/hr	Annual Throughput ton/yr	Control Efficiency
2,380	10,424	99.0%

	PM	PM10	
Emission Factor in lb/hr	35.0	35.0	**Controlled PM/PM10**
Potential Emission in tons/yr	**153**	**153**	**1.53**

*Emission factors are based on baghouse collections and their efficiencies and the production run on each mill.
*Assume PM10 = PM2.5

Methodology
Potential to Emit PM and PM10 (tons/yr) = Emission Factor (lb/hr) x (8760 hr/year) x 1 ton/2,000 lb
Controlled PM/PM10 (tons/yr) = PTE PM/PM10 x (1 - Control Efficiency %)

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID#	Maximum capacity of Moritz Mills	Process Weight Rate	Allowable PM Emissions	Allowable PM Emissions	Unlimited PM emissions	**FESOP and PSD Minor Limits**	
						Limited PM/PM10/PM 2.5 Emissions	Limited PM/PM10/PM2.5 Emissions
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)	(lb/hr)	(lb/hr)	(tons/yr)
EU-152	1,700	0.85	3.68	16.11	25	3.68	16.12
EU-153	1,700	0.85	3.68	16.11	25	3.68	16.12
EU-154	2,380	1.19	4.61	20.18	35	4.61	20.19
				52.39			52.43

Notes for the Moritz Mills: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

Appendix A: Emissions Calculations
Particulate Emissions from Weigh Hopper (EU-157)
Particulate Emissions from two (2) Weigh Hoppers (EU-156 and Eu-157)
Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

Control Device	Controlled Units	Amount PM Collected (lb/hr)*	Uncontrolled Particulate Emissions (ton/yr)	Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	Controlled Particulate Emissions (lb/hr)
C-156	EU-156*	29.40	130.07	99.00%	1.30	0.30
C-157	EU-157**	0.90	3.98	99.00%	0.04	0.01

Notes:
*Silos EU-103 and EU-105 directly vent to Weigh Hopper EU-156, and so the amount PM collected (lb/hr) is based on the total for these two silos
**The PM/PM10 emission factors are based on baghouse collection information.
*Assume PM10 = PM2.5

Methodology
Uncontrolled PM/PM10 Emissions (ton/yr) = Amount Collected (lb/hr) / (Control Efficiency %) * 8760 hr/yr * 1 ton/2000 lbs
Controlled PM/PM10 Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) * (1 - Control Efficiency %)

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID#	Maximum capacity of Weigh Hopper	Process Weight Rate	Allowable PM Emissions	Allowable PM Emissions	Unlimited PM Emissions	FESOP and PSD Minor Limit	
						Limited PM/PM10/PM2.5 Emissions	Limited PM/PM10/PM2.5 Emissions
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)	(lb/hr)	(lb/hr)	(tons/yr)
EU-156	205.42	0.10	0.89	3.91	29.70	0.89	3.91
EU-157	870	0.44	2.35	10.28	0.91	0.02	0.09

Notes for the Weigh Hoppers: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

Appendix A: Emissions Calculations
VOC and Particulate Emissions from Pellet Production (EU-112 through EU-119)

Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

Unit ID	Material Processed	Process Weight (lb/hr)	Process Weight (tons/yr)	PM Emission Factor (lb/ton)	PTE PM (tons/year)	PM10 Emission Factor (lb/ton)	PTE PM10 (tons/year)	VOC Emission Factor (lb/ton)	PTE VOC (tons/year)
EU-112	Plastic Pellets	1,000	4,380	0.032	0.07	0.032	0.07	0.30	0.66
EU-113	Plastic Pellets	700	3,066	0.032	0.05	0.032	0.05	0.30	0.46
EU-114	Plastic Pellets	1,800	7,884	0.032	0.13	0.032	0.13	0.30	1.18
EU-115	Plastic Pellets	1,200	5,256	0.032	0.08	0.032	0.08	0.30	0.79
EU-116	Plastic Pellets	1,200	5,256	0.032	0.08	0.032	0.08	0.30	0.79
EU-117	Plastic Pellets	1,500	6,570	0.032	0.11	0.032	0.11	0.30	0.99
EU-118	Plastic Pellets	1,500	6,570	0.032	0.11	0.032	0.11	0.30	0.99
EU-119	Plastic Pellets	600	2,628	0.032	0.04	0.032	0.04	0.30	0.39
				Total	**0.67**		**0.67**		**6.24**

Notes: The PM, PM10, and VOC emission factors are based on emission factors for a similar facility (Chemtrusion, FESOP 019-9668-00091), the EF based on the SCC: 3-01-018-21.
*Assume PM10 = PM2.5

Methodology:
Potential to emit PM, PM10, and VOC (tons/year) = Maximum Process Weight (tons/yr) x Emission Factor (lb/ton) x 1 ton/2000 lbs

The plastic pellet production lines are not subject to 326 IAC 6-3-2 because the potential to emit PM from each unit is less than 0.551 pounds per hour, exempt.

Appendix A: Emissions Calculations
VOC and Particulate Emissions from one (1) Banbury Mixer (EU-122)
and Twin Banbury/Extruder/Mixer Line (EU-123)
Source Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Permit Reviewer: Nida Habeeb

Unit ID	Control Device	Process	Process Weight (lb/hr)	Process Weight (tons/yr)	PM Emission Factor (lb/hr)	PTE PM (tons/year)	PM10 Emission Factor (lb/ton)	PTE PM10 (tons/year)	Control Efficiency (%)	Controlled PTE PM/PM (tons/year)	Controlled PTE PM/PM (lbs/hr)
EU-122	C-122	Banbury Mixer (EU-122)	3,700	16,206	26.0	210.68	26.0	210.68	99.00%	2.11	0.48
EU-123		Twin Banbury/Extruder/Mixer Line (EU-123)	660	2,891	26.0	37.58	27.0	39.03	99.00%	0.39	0.09
					Total	**248.26**		**249.70**		**2.50**	**0.57**

Notes: The PM/PM10 emission factors are based on baghouse collection information.
The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123 and Banbury Mixer EU-122.
Stack testing will be required in this FESOP to verify the emission factors.
*Assume PM10 = PM2.5

Methodology:
Potential to emit PM/PM10 (tons/year) = Emission Factor (lb/hr) x 8,760 hr/year x 1 ton/2000 lbs

		326 IAC 6-3-2 PM Allowable Rate of Emissions				FESOP and PSD Minor Limits	
Unit ID#	Maximum capacity of Banbury Mixers	Process Weight Rate	Allowable PM Emissions	Allowable PM Emissions	Unlimited PM emissions	Limited PM/PM10/PM2.5 Emissions	Limited PM/PM10/PM2.5 Emissions
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)	(lb/hr)	(lbs/hr)	(tons/yr)
EU-122	3,700	1.85	6.19	27.12	48.1	0.50	2.19
EU-123	660.00	0.33	1.95	8.54	8.91	0.10	0.44

Notes for the Banbury Mixers: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

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

Company Name: **Ilpea Industries, Inc. (formerly Holm Industries, Inc.)**
Address City IN Zip: **1320 S. Main Street, Scottsburg, Indiana 47170**
Permit Number: **F143-32451-00018**
Reviewer: **Nida Habeeb**

Unit	ID#	MMBtu/hr	Total
Air make-up	EU-119	1.1	1.1
Space Heaters	EU-136, EU-141, EU-142 and EU-143	0.14	0.56
Space Heaters	EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146 and EU-147	0.25	2.00
Space Heaters	EU-148 and EU-149	0.4	0.8
Cleaver Brooks Boiler	EU-151	2.5	2.5
			6.96

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	mmBtu / mmscf	MMCF/yr
6.96	1020	59.8

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.06	0.23	0.23	0.02	2.99	0.16	2.51

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
*Assume PM10 = PM2.5

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.3E-05	3.6E-05	2.2E-03	0.05	1.0E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.5E-05	3.3E-05	4.2E-05	1.1E-05	6.3E-05

Total	0.06

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

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,586	0.07	0.07
Summed Potential Emissions in tons/yr	3,587		
CO2e Total in tons/yr	3,608		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x

updated 7/11

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Company Name: Ilpea Industries, Inc. (formerly Holm Industries, Inc.)
Address City IN Zip: 1320 S. Main Street, Scottsburg, Indiana 47170
Permit Number: F143-32451-00018
Reviewer: Nida Habeeb

From two (2) rotary calcinating kilns (EU-101 and EU-102)

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
20.0	1020	171.8

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.16	0.65	0.65	0.05	8.59	0.47	7.21

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
*Assume PM10 = PM2.5

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.8E-04	1.0E-04	6.4E-03	0.15	2.9E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.3E-05	9.4E-05	1.2E-04	3.3E-05	1.8E-04

Total	**0.16**

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

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	10,306	0.2	0.2
Summed Potential Emissions in tons/yr	10,306		
CO2e Total in tons/yr	10,369		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Evaporator - EU-124

Company Name: **Ilpea Industries, Inc. (formerly Holm Industries, Inc.)**
Address City IN Zip: **1320 S. Main Street, Scottsburg, Indiana 47170**
Permit Number: **F143-32451-00018**
Reviewer: **Nida Habeeb**

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
0.95	1020	8.2

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.03	0.03	0.002	0.41	0.02	0.34

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
*Assume PM10 = PM2.5

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	8.6E-06	4.9E-06	3.1E-04	7.3E-03	1.4E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.0E-06	4.5E-06	5.7E-06	1.6E-06	8.6E-06

Total	**7.7E-03**

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

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	490	0.009	0.009
Summed Potential Emissions in tons/yr	489.55		
CO2e Total in tons/yr	492.51		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr

updated 7/11

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Heidi Morris
Ilpea Industries, Inc.
745 S Gardner St.
Scottsburg, Indiana 47170

DATE: August 5, 2013

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

SUBJECT: Final Decision
FESOP Renewal
143-32451-00018

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:
Paul Schiefley, VP – Ops / Ilpea Industries, Inc.
Jennifer Triplett / Environmental Compliance Source
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.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 5, 2013

TO: Scott 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: **Ilpea Industries, Inc.**
Permit Number: **143-32451-00018**

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 6/13/2013

Mail Code 61-53

IDEM Staff	AWELLS 8/5/2013 Ilpea Industries Inc 143-32451-00018 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Heidi Morris Ilpea Industries Inc 745 S Gardner St Scottsburg IN 47170 (Source CAATS) confirmed delivery									
2		Paul Schiefley VP - Ops Ilpea Industries Inc 745 S Gardner St Scottsburg IN 47170 *(RO CAATS)*									
3		Scott County Health Department 1471 N. Gardner St Scottsburg IN 47170-7751 *(Health Department)*									
4		Scott Co Public Library 108 S Main St Scottsburg IN 47170-1892 *(Library)*									
5		Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 47170 *(Local Official)*									
6		Jennifer Triplett Environmental Compliance Source PO Box 6849 New Albany In 47150 *(Consultant)*									
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