



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 25, 2013

RE: Industrial Plastics Group, LLC / 163-32833-00190

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

### Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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April 25, 2013

Dirk Johnson  
Industrial Plastics Group, LLC  
EHS Manager, PO Box 608  
Mt. Vernon, IN 47620

Re: 163-32833-00190  
First Administrative Amendment to  
M163-31739-00190

Dear Mr. Johnson:

Industrial Plastics Group, LLC was issued a Minor Source Operating Permit (MSOP) No. M163-31739-00190 on November 27, 2012 for a stationary facility manufacturing plastic pellets from plastics and fire retardants located at PO Box 608, Mt. Vernon, IN 47620. On February 14, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to add an additional plastic pellet extrusion line # 5 to increase the plant capacity by approximately 25%.

Pursuant to 326 IAC 2-6.1-6(d)(8), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit or units of the same type that is already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, and the modification does not result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), or 326 IAC 2-7 (Part 70 Operating Permit).

The PTE of the proposed modification is as follows:

Process/ Emission Unit	PTE of Proposed Modification (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Extrusion line #5	24.81	24.81	24.81	-	-	-	-	-	-	-
Total PTE of Proposed Modification	24.81	24.81	24.81	-	-	-	-	-	-	-

(a) The uncontrolled/unlimited potential to emit of the modification is more than 5 tons/year and less than 25 tons/year, therefore it is an MSOP Administrative Amendment (See Appendix A for the calculations).

(b) No new state rules are applicable to this source due to the addition of the emission unit.

## PTE of the Entire Source After Issuance of the MSOP Administrative Amendment

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~values~~.

The table below summarizes the potential to emit of the entire source after issuance of this administrative amendment, reflecting all limits, of the emission units. Any control equipment is considered federally

enforceable only after issuance of this MSOP Administrative Amendment, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below has bold text un-bolded and strikethrough text deleted)

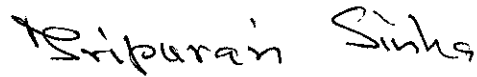
Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Extruder B	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder I	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder J	20.44	20.44	20.44	-	-	-	-	-	-	-
Extruder K	12.40	12.40	12.40	-	-	-	-	-	-	-
Extruder #5	24.81	24.81	24.81	-	-	-	-	-	-	-
Product cutting machines	negl	negl	negl	-	-	-	-	-	-	-
Auger Machines	negl	negl	negl	-	-	-	-	-	-	-
Blender	5.48	5.48	5.48	-	-	-	-	-	-	-
Grinder	negl	negl	negl	-	-	-	-	-	-	-
Injection Molding machine	negl	negl	negl	-	-	negl	-	-	-	-
Vacuum System for gaylord boxes	negl	negl	negl	-	-	-	-	-	negl	negl
<b>Total PTE of Entire Source</b>	<b>99.05</b>	<b>99.05</b>	<b>99.05</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>0.0</b>	<b>0.0</b>	<b>-</b>	<b>-</b>
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". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Diya Bhattacharjee, of my staff, at 317-234-5372 or 1-800-451-6027, and ask for extension 5372.

Sincerely,

A handwritten signature in black ink, reading "Tripurari Sinha". The signature is written in a cursive, slightly slanted style.

Tripurari P. Sinha, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit, TSD and Appendix A

TS /DB

cc: File - Vanderburgh County  
Vanderburgh County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch



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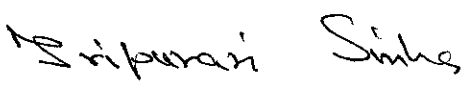
## Minor Source Operating Permit OFFICE OF AIR QUALITY

**Industrial Plastics Group, LLC**  
**901 East Virginia Street**  
**Evansville, Indiana 47711**

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

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

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

Operation Permit No.: M 163-32833-00190	
Issued by:   Tripurari P. Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 25, 2013  Expiration Date: April 25, 2018

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>4</b>
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
<b>B. GENERAL CONDITIONS .....</b>	<b>7</b>
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]	
B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability	
B.7 Severability	
B.8 Property Rights or Exclusive Privilege	
B.9 Duty to Provide Information	
B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.14 Permit Renewal [326 IAC 2-6.1-7]	
B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.16 Source Modification Requirement	
B.17 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.19 Annual Fee Payment [326 IAC 2-1.1-7]	
B.20 Credible Evidence [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>12</b>
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
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 Permit Revocation [326 IAC 2-1.1-9]	
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 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Instrument Specifications [326 IAC 2-1.1-11]	
<b>Corrective Actions and Response Steps</b>	
C.12 Response to Excursions or Exceedances	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	

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

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]  
[IC 13-14-1-13]

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 18**

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

- D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]
- D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

**Compliance Determination Requirements**

- D.1.3 Particulate Control
- D.1.4 Broken or Failed Bag Detection

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

- D.1.5 Visible Emissions Notations

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

- D.1.6 Record Keeping Requirement

Annual Notification .....	22
Malfunction Report .....	23
Affidavit of Construction .....	24

## SECTION A

## SOURCE SUMMARY

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

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

---

The Permittee owns and operates a stationary manufacturing plastic pellets from plastics and fire retardants.

Source Address:	901 East Virginia Street, Evansville, Indiana 47711
General Source Phone Number:	(812) 459-6414
SIC Code:	2821 (Plastics Materials, Synthetic Resins, and Nonvulcanizable Elastomers)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Pellet processing line, identified as line 1, installed in 2001, with maximum capacity 2,000 pounds per hour of polycarbonate, EVA, bromine, and fiberglass, nylon and polypropylene, consisting with the following units:
  - (1) One (1) extruder machine, identified as B, using baghouse-A to control PM and exhausting to stack A.
  - (2) One (1) electric heater.
  - (3) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands.
  - (4) One (1) Auger machine.
- (b) One (1) Pellet processing line, identified as line 2, installed in 2006, with maximum capacity 2,000 pounds per hour of polycarbonate, EVA, antimony, bromine, and PTFE (Teflon), consisting with the following units:
  - (1) One (1) extruder machine, identified as I, using baghouse-B to control PM and exhausting to stack B.
  - (2) One (1) electric heater.
  - (3) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands.
  - (4) Two (2) Auger machines.



- (c) One (1) Pellet processing line, identified as line 3, installed in 2008, with maximum capacity 2450 pounds per hour of polycarbonate, brominated polycarbonate, PBT, and ABS, consisting with the following units:
  - (1) One (1) extruder machine, identified as J, using baghouse-A to control PM and exhausting to stack A.
  - (2) One (1) electric heater.
  - (3) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands.
- (d) One (1) Pellet processing line, identified as line 4, installed in 2011, with maximum capacity 1,200 pounds per hour of polycarbonate, acrylonitrile butadiene styrene, brominated polycarbonate, PBT, consisting with the following units:
  - (1) One (1) extruder machine, identified as K, installed in, with no control and exhausting indoors.
  - (2) One (1) electric heater.
  - (3) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands.
- (e) One (1) Pellet processing line, identified as line 5, approved for construction in 2013, with maximum capacity 2,400 pounds per hour of glass filled poly-propyl, glass filled nylon, ABS, Polycarbonate (PC), PC ABS, and PBT with mica consisting with the following units:
  - (1) One (1) extruder machine, identified as #5, approved for construction in 2013, with baghouse as control and exhausting indoors.
  - (2) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands without control and exhausting indoors.
- (f) One (1) Blender, with a maximum capacity 100,000 pounds per day of materials listed on the extruders.
- (g) One (1) Grinder, with a maximum capacity 2,000 pounds per day of materials listed on the extruders.
- (h) One (1) injection molding machine, with a maximum capacity 200 pounds per hour of ABS, polycarbonate, PC ABS.
- (i) One (1) Vacuum System for gaylord boxes, identified as 001, installed in January 2000, with maximum throughput of loading 7,000 tons per year of polycarbonate.
- (j) Two (2) Vacuum Systems for packing material prior to use, installed in 2012.
- (k) One (1) Auger System for supersacks, identified as 002, installed in January 2008, with maximum throughput of loading of 5460 tons per year of bromine, antimony, polycarbonate, EVA, Teflon, TVA.
- (l) Two (2) welding machines, installed in 2007 and 2008.
- (m) One (1) Portable Torch, installed in 2011.

- (n) One (1) Plasma Cutter, installed in 2009.
- (o) Four (4) Fork Trucks.
- (p) Transfer Bag Station for supersacks by National Buck Equipment, installed in June 2012.

## SECTION B

## GENERAL CONDITIONS

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

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

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

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

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

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

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

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

---

- (a) This permit, M 163-31739-00190, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.6 Enforceability

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

**B.7 Severability**

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

**B.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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

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

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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- (a) All terms and conditions of permits established prior to M 163-31739-00190 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

**B.16 Source Modification Requirement**

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

**B.17 Inspection and Entry**

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

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

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

pollution control equipment), practices, or operations regulated or required under this permit;

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

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

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

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

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

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

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

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

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

**C.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of thirty percent (30%) 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]**

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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

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

### **Corrective Actions and Response Steps**

#### **C.12 Response to Excursions or Exceedances**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) Pellet processing line, identified as line 1, installed in 2001, with maximum capacity 2,000 pounds per hour of polycarbonate, EVA, bromine, and fiberglass, nylon and polypropylene, consisting with the following units:
  - (1) One (1) extruder machine, identified as B, using baghouse-A to control PM and exhausting to stack A.
  - (2) One (1) electric heater.
  - (3) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands.
  - (4) One (1) Auger machine.
- (b) One (1) Pellet processing line, identified as line 2, installed in 2006, with maximum capacity 2,000 pounds per hour of polycarbonate, EVA, antimony, bromine, and PTFE (Teflon), consisting with the following units:
  - (1) One (1) extruder machine, identified as I, using baghouse-B to control PM and exhausting to stack B.
  - (2) One (1) electric heater.
  - (3) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands.
  - (4) Two (2) Auger machines.
- (c) One (1) Pellet processing line, identified as line 3, installed in 2008, with maximum capacity 2,450 pounds per hour of polycarbonate, brominated polycarbonate, PBT, and ABS, consisting with the following units:
  - (1) One (1) extruder machine, identified as J, using baghouse-A to control PM and exhausting to stack A.
  - (2) One (1) electric heater.
  - (3) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands.
- (d) One (1) Pellet processing line, identified as line 4, installed in 2011, with maximum capacity 1,200 pounds per hour of polycarbonate, acrylonitrile butadiene styrene, brominated polycarbonate, PBT, consisting with the following units:
  - (1) One (1) extruder machine, identified as K, installed in, with no control and exhausting indoors.
  - (2) One (1) electric heater.
  - (3) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands.

- (e) One (1) Pellet processing line, identified as line 5, approved for construction in 2013, with maximum capacity 2,400 pounds per hour of glass filled poly-propyl, glass filled nylon, ABS, Polycarbonate (PC), PC ABS, and PBT with mica consisting of the following units:
  - (1) One (1) extruder machine, identified as #5, approved for construction in 2013, with baghouse as control and exhausting indoors.
  - (2) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands without control and exhausting indoors.
- (e) One (1) Blender, with a maximum capacity 100,000 pounds per day of materials listed on the extruders.
- (f) One (1) Grinder, with a maximum capacity 2,000 pounds per day of materials listed on the extruders.
- (g) One (1) injection molding machine, with a maximum capacity 200 pounds per hour of ABS, polycarbonate, PC ABS.
- (h) One (1) Vacuum System for gaylord boxes, identified as 001, installed in January 2000, with maximum throughput of loading 7,000 tons per year of polycarbonate.
- (i) Two (2) Vacuum Systems for packing material prior to use, installed in 2012.
- (j) One (1) Auger System for supersacks, identified as 002, installed in January 2008, with maximum throughput of loading of 5460 tons per year of bromine, antimony, polycarbonate, EVA, Teflon, TVA.
- (k) Two (2) welding machines, installed in 2007 and 2008.
- (l) One (1) Portable Torch, installed in 2011.
- (m) One (1) Plasma Cutter, installed in 2009.
- (n) Four (4) Fork Trucks.
- (o) Transfer Bag Station for supersacks by National Buck Equipment, installed in June 2012.

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

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

##### **D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each extruder machine and the blender shall not exceed the pounds per hour listed in the following table:

Emission Units	Control devices	Process Weight Rate (pounds per hour )	PM Emission Limit (pounds per hour)
Extruder machine B	Baghouse-A	2,000	4.1
Extruder machine J		2,450	4.7
Extruder machine I	Baghouse-B	2,000	4.1
Extruder machine K	NA	1,200	2.91
Blender	NA	4,166.67	6.7
Extruder machine 5	Baghouse-5	2400	4.63

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

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

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

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

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.1.3 Particulate Control

In order to comply with Condition D.1.1, the baghouses (A, B and 5) for Extruder machines B, I, J, and 5 for particulate control shall be in operation and control emissions from the operation at all times, while the associated unit is in operation.

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.1.4 Broken or Failed Bag Detection

- (a) For a single compartment dust collector 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. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.
- (b) For a single compartment dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

Bag failure can be indicated by a significant drop in the dust collectors' 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.



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

### **D.1.5 Visible Emissions Notations**

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- (a) Visible emission notations of the exhaust stack A, stack B and 5 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

### **D.1.6 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.5 the Permittee shall maintain daily records of visible emission notations of the stack A and stack B. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Industrial Plastics Group, LLC
<b>Address:</b>	901 East Virginia Street
<b>City:</b>	Evansville, Indiana 47711
<b>Phone #:</b>	(812) 459-6414
<b>MSOP #:</b>	M 163-32833-00190

I hereby certify that Industrial Plastics Group, LLC is:

☐ still in operation.

☐ no longer in operation.

I hereby certify that Industrial Plastics Group, LLC is:

☐ in compliance with the requirements of  
MSOP M 163-31739-00190.

☐ not in compliance with the requirements of  
MSOP M 163-31739-00190.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

## MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_        AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_        AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO<sub>2</sub>, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

Industrial Plastics Group, LLC  
901 East Virginia Street  
Evansville, Indiana 47711

Affidavit of Construction

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

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Industrial Plastics Group, LLC 901 East Virginia Street, Evansville, Indiana 47711, completed construction of the \_\_\_\_\_ on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 13, 2012 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M 163-31739-00190, Plant ID No. 163-00190 issued on \_\_\_\_\_.
5. Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

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

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

**Technical Support Document (TSD) for a Minor Source Operating Permit  
(MSOP)**

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

<b>Source Name:</b>	<b>Industrial Plastics Group, LLC</b>
<b>Source Location:</b>	<b>901 East Virginia Street, Evansville, IN 477711</b>
<b>County:</b>	<b>Vanderburgh</b>
<b>SIC Code:</b>	<b>2821</b>
<b>Operation Permit No.:</b>	<b>M163-32833-00190</b>
<b>Permit Reviewer:</b>	<b>Diya Bhattacharjee</b>

On February 14, 2013, the Office of Air Quality (OAQ) received an application from Industrial Plastics Group, LLC related to a modification to an existing stationary plant manufacturing plastic pellets from plastics and fire retardants.

<b>County Attainment Status</b>
---------------------------------

The source is located in Vanderburgh County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Unclassifiable or attainment effective October 27, 2011, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Vanderburgh County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

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

**Fugitive Emissions**

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

**Status of the Existing Source**

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

This PTE table is from the TSD or Appendix A of 163-31739-00190 issued on November 27, 2012

Process/ Emission Unit	Potential To Emit of the Entire Source Before Issuance of Amendment (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Extruder B	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder I	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder J	20.44	20.44	20.44	-	-	-	-	-	-	-
Extruder K	12.40	12.40	12.40	-	-	-	-	-	-	-
Product cutting machines	negl	negl	negl	-	-	-	-	-	-	-
Auger Machines	negl	negl	negl	-	-	-	-	-	-	-
Blender	5.48	5.48	5.48	-	-	-	-	-	-	-
Grinder	negl	negl	negl	-	-	-	-	-	-	-
Injection Molding machine	negl	negl	negl	-	-	negl	-	-	-	-
Vacuum System for gaylord boxes	negl	negl	negl	-	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>74.24</b>	<b>74.24</b>	<b>74.24</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>negl</b>
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".

\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

### Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Industrial Plastics Group LLC on February 14, 2013, relating to the construction of a fifth plastic pellet extrusion line to increase the plant's capacity by 25%. The 2,400 pounds per hour twin extruder (400hp) will exhaust to a control device (bag-house) and then into the room in which the fifth line is housed in.

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

- (a) One (1) Pellet processing line, identified as line 5, approved for construction in 2013, with maximum capacity 2,400 pounds per hour of glass filled poly-propyl, glass filled nylon, ABS, Polycarbonate (PC), PC ABS, and PBT with mica consisting with the following units:
  - (1) One (1) extruder machine, identified as #5, approved for construction in 2013, with baghouse as control and exhausting indoors.
  - (2) One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands, without control, and exhausting indoors.

### Enforcement Issues

There are no pending enforcement actions related to this amendment.

### Emission Calculations

Process/ Emission Unit	PTE of Proposed Modification (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Extrusion line #5	24.81	24.81	24.81	-	-	-	-	-	-	-
Total PTE of Proposed Modification	24.81	24.81	24.81	-	-	-	-	-	-	-

See Appendix A of this TSD for detailed emission calculations.

Pursuant to 326 IAC 2-6.1-6(d)(8), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit or units of the same type that is already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, and the modification does not result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), or 326 IAC 2-7 (Part 70 Operating Permit).

### PTE of the Entire Source After Issuance of the MSOP Amendment

The table below summarizes the potential to emit of the entire source after issuance of this amendment, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit amendment, 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 Amendment (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Extruder B	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder I	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder J	20.44	20.44	20.44	-	-	-	-	-	-	-
Extruder K	12.40	12.40	12.40	-	-	-	-	-	-	-
<b>Extruder #5</b>	<b>24.81</b>	<b>24.81</b>	<b>24.81</b>	-	-	-	-	-	-	-
Product cutting machines	negl	negl	negl	-	-	-	-	-	-	-
Auger Machines	negl	negl	negl	-	-	-	-	-	-	-
Blender	5.48	5.48	5.48	-	-	-	-	-	-	-
Grinder	negl	negl	negl	-	-	-	-	-	-	-
Injection Molding machine	negl	negl	negl	-	-	negl	-	-	-	-
Vacuum System for gaylord boxes	negl	negl	negl	-	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>74.24 99.05</b>	<b>74.24 99.05</b>	<b>74.24 99.05</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>negl</b>
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". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

#### MSOP Status

- (a) This amendment to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit regulated pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This amendment will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) This amendment will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHGs) will still be less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Amendment (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Extruder B	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder I	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder J	20.44	20.44	20.44	-	-	-	-	-	-	-
Extruder K	12.40	12.40	12.40	-	-	-	-	-	-	-
Extruder #5	24.81	24.81	24.81	-	-	-	-	-	-	-
Product cutting machines	negl	negl	negl	-	-	-	-	-	-	-
Auger Machines	negl	negl	negl	-	-	-	-	-	-	-
Blender	5.48	5.48	5.48	-	-	-	-	-	-	-
Grinder	negl	negl	negl	-	-	-	-	-	-	-
Injection Molding machine	negl	negl	negl	-	-	negl	-	-	-	-
Vacuum System for gaylord boxes	negl	negl	negl	-	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>99.05</b>	<b>99.05</b>	<b>99.05</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>negl</b>
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". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

### Federal Rule Applicability Determination

#### New Source Performance Standards (NSPS)

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

#### National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 20 and 40 CFR part 63):

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed amendment.

#### Compliance Assurance Monitoring (CAM) (40 CFR 64) :

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

<b>State Rule Applicability Determination</b>
---

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Amendment Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
None of the emission units are subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new facility is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 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 thirty percent (30%) 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.
- (f) 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.
- (g) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
None of the emission units are subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each new unit is less than twenty-five (25) tons per year.
- (j) There are no other 326 IAC 8 Rules that are applicable to the facility.

### Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: 163-31739-00190, issued on November 27, 2012.

### Proposed Changes

- (a) The following changes listed below are due to the proposed amendment. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

#### A.2 Emission Units and Pollution Control Equipment Summary

...

- (e) **One (1) Pellet processing line, identified as line 5, approved for construction in 2013, with maximum capacity 2,400 pounds per hour of glass filled poly-propyl, glass filled nylon, ABS, Polycarbonate (PC), PC ABS, and PBT with mica consisting with the following units:**
- (1) **One (1) extruder machine, identified as #5, approved for construction in 2013, with baghouse as control and exhausting indoors.**
  - (2) **One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands, without control and exhausting indoors.**

#### Emissions Unit Description:

...

- (e) **One (1) Pellet processing line, identified as line 5, approved for construction in 2013, with maximum capacity 2,400 pounds per hour of glass filled poly-propyl, glass filled nylon, ABS, Polycarbonate (PC), PC ABS, and PBT with mica consisting with the following units:**
- (1) **One (1) extruder machine, identified as #5, approved for construction in 2013, with baghouse as control and exhausting indoors.**
  - (2) **One (1) product-cutting machine, to cut pellets to 1/8"x1/8" stands, without control and exhausting indoors.**

...

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

**Condition D.1.1**

Emission Units	Control devices	Process Weight Rate (pounds per hour )	PM Emission Limit (pounds per hour)
Extruder machine B	Baghouse-A	2,000	4.1
Extruder machine J		2,450	4.7
Extruder machine I	Baghouse-B	2,000	4.1
Extruder machine K	NA	1,200	2.91
Blender	NA	4,166.67	6.7
<b>Extruder Line #5</b>	<b>Baghouse-5</b>	<b>2400</b>	<b>4.63</b>

...

<b>Conclusion and Recommendation</b>
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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 February 14, 2013.

The construction and operation of this proposed amendment shall be subject to the conditions of the attached proposed MSOP Administrative Amendment No. 163-32833-00190. The staff recommends to the Commissioner that this MSOP Administrative Amendment be approved.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Diya Bhattacharjee 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)234-5372 or toll free at 1-800-451-6027 extension 5372.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emissions Calculations  
Emission Summary**

Company Name: Industrial Plastics Group, LLC  
Address City IN Zip: 901 East Virginia Street, Evansville IN 47711  
Permit Number: 163 - 32833 - 00190  
Reviewer: Diya Bhattacharjee

Potential Emissions (tons/year)										
Operation/Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Single HAP	Combined HAPs
Extruder B	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder I	17.96	17.96	17.96	-	-	-	-	-	-	-
Extruder J	20.44	20.44	20.44	-	-	-	-	-	-	-
Extruder K	12.40	12.40	12.40	-	-	-	-	-	-	-
Extruder #5	24.81	24.81	24.81	-	-	-	-	-	-	-
Product cutting machines	negl	negl	negl	-	-	-	-	-	-	-
Auger Machines	negl	negl	negl	-	-	-	-	-	-	-
Blender	5.48	5.48	5.48	-	-	-	-	-	-	-
Grinder	negl	negl	negl	-	-	-	-	-	-	-
Injection Molding machine	negl	negl	negl	-	-	negl	-	-	-	-
Vacuum System for gaylord boxes	negl	negl	negl	-	-	-	-	-	-	-
<b>Total</b>	<b>99.05</b>	<b>99.05</b>	<b>99.05</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>0.0</b>	<b>0.0</b>	<b>negl</b>	<b>negl</b>

Note: Total PTE prior to the control devices and the limits are not required for this source

**Appendix A: Emissions Calculations  
Extruders**

**Company Name:** Industrial Plastics Group, LLC  
**Address City IN Zip:** 901 East Virginia Street, Evansville IN 47711  
**Permit Number:** 163 - 32833 - 00190  
**Reviewer:** Diya Bhattacharjee

PM/PM10/PM2.5 emission factor (lb/ton) - before control					
Machines B, and I <sup>(1)</sup>	4.1				
Machine J <sup>(2)</sup>	3.81				
Machine K <sup>(3)</sup>	4.72				
Extruder Machine #5(4)	4.72				

Pollutants	PM	PM10	PM2.5
Control efficiency <sup>(5)</sup>	0.9999	0.9999	0.9999

		PTE Before Control				Controlled Emissions		
Units	Maximum Throughput Rate (pounds/hr)	PM (lbs/hr)	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
Extruder Machine B	2000	4.10	17.96	17.96	17.96	0.002	0.002	0.002
Extruder Machine I	2000	4.10	17.96	17.96	17.96	0.002	0.002	0.002
Extruder Machine J	2450	4.67	20.44	20.44	20.44	0.002	0.002	0.002
Extruder Machine K	1200	2.83	12.40	12.40	12.40	NA	NA	NA
Extruder Machine #5	2400	5.66	24.81	24.81	24.81	0.002	0.002	0.002
Total		21.4	93.57	93.57	93.57	0.01	0.01	0.01

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

Units	Maximum Throughput Rate (tons/hr)	Particulate Emission Limits 326 IAC 6-3 (lbs/hr)
Extruder Machine B	1.00	4.10
Extruder Machine I	1.00	4.10
Extruder Machine J	1.23	4.70
Extruder Machine K	0.60	2.91
Extruder Machine #5	1.20	4.63

**Methodology:**

Assumption PM = PM10 = PM2.5

- <sup>(1)</sup> The emission factor is from SABIC (T129-30384-00002), page 277--- PM = 4.1 lb/hr /1.0 ton/hr = 4.1 lb/ton.
- <sup>(2)</sup> The emission factor is from SABIC (T129-30384-00002), page 277--- PM = 4.76 lb/hr /1.25 tons/hr = 3.81 lb/ton.
- <sup>(3)</sup> The emission factor is from SABIC (T129-30384-00002), page 276--- PM = 3.07 lb/hr /0.65 tons/hr = 4.72 lb/ton.
- <sup>(4)</sup> The emission factor is from SABIC (T129-30384-00002), page 276--- PM = 3.07 lb/hr /0.65 tons/hr = 4.72 lb/ton.

These emission factors are considered alternative emission factors, therefore, a one-time testing will be required for one of the these extruder Machines.

- <sup>(5)</sup> The control efficiency is provided by source that it is 99.99%. For PM 0.5 microns or larger

Potential to emit of PM/PM10/PM2.5 (Uncontrolled) (lbs/hr) = Throughput rate (pounds/hr) \* emission factor (lbs/ton) / 2000 pounds/ton  
 Potential to emit of PM/PM10/PM2.5 (Uncontrolled) (tons/yr) = PTE of PM/PM10/PM2.5 (lbs/hour) \* (8760 hr/yr) / 2,000 lb/ton

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

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

Particulate Emission Limits (lbs/hr) = 4.10 (maximum process weight rate in tons/hr)^0.67

## Appendix A: Emissions Calculations Blender

**Company Name:** Industrial Plastics Group, LLC  
**Address City IN Zip:** 901 East Virginia Street, Evansville IN 47711  
**Permit Number:** 163 - 32833 - 00190  
**Reviewer:** Diya Bhattacharjee

				Potential to Emit	
Emission Units	Maximum Throughput Rate (pounds/day)	Maximum Throughput Rate (pounds/hr)	EF (PM) (lbs/ton)	PM/PM10/PM2.5 (lb/hr)	PM/PM10/PM2.5 (tons/yr)
Blender	100,000.00	4,166.67	0.60	1.25	5.48

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

Units	Maximum Throughput Rate (tons/hr)	Particulate Emission Limits 326 IAC 6-3 (lbs/hr)
Blender	2.1	6.70

#### Methodology:

Emission Factor from AP42, mixing (SCC 3-05-012-23) Table 11.21-4 (9-95).

Assumption PM = PM10 = PM2.5

Potential to emit of PM/PM10/PM2.5 (lbs/hr) = Throughput rate (pounds/hr) \* emission factor (lbs/ton) / 2000 pounds/ton

Potential to emit of PM/PM10/PM2.5 (tons/yr) = PTE (pounds/hr) \* 8760 (hr/yr) / 2000 pounds/ton

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

Particulate Emission Limits (lbs/hr) = 4.10 (maximum process weight rate in tons/hr)<sup>0.67</sup>



**Appendix A: Emissions Calculations  
Pelletizer (Line #5)**

**Company Name: Industrial Plastics Group, LLC**  
**Address City IN Zip: 901 East Virginia Street, Evansville IN 47711**  
**Permit Number: 163 - 32833 - 00190**  
**Reviewer: Diya Bhattacharjee**

<b>Potential to Emit</b>				
Emission Units	Maximum Throughput Rate (pounds/hour)	EF (PM) (lbs/ton)	PM/PM10/P M2.5 (lb/hr)	PM/PM10/PM2. 5 (tons/yr)
Pelletizer	1,500	0.60	0.45	1.97

**Methodology:**

Emission Factor from AP42, mixing (SCC 3-05-012-23) Table 11.21-4 (9-95).

Assumption PM = PM10 =

Potential to emit of PM/PM10/PM2.5 (lbs/hr) = Throughput rate (pounds/hr) \* emission factor (lbs/ton) / 2000 pounds/ton

Potential to emit of PM/PM10/PM2.5 (tons/yr) = PTE (pounds/hr) \* 8760 (hr/yr) / 2000 pounds/ton

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

Particulate Emission Limits (lbs/hr) = 4.10 (maximum process weight rate in tons/hr)<sup>0.67</sup>



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

TO: Dirk Johnson  
Industrial Plastics Group, LLC  
PO Box 608  
Mount Vernon, IN 47620

DATE: April 25, 2013

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

SUBJECT: Final Decision  
Administrative Amendment  
163-32833-00190

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:  
Barry Cox - President  
Christopher Zirkelbach – Environmental & Safety Solutions  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	GHOTOPP 4/25/2013 Industrial Plastics Group LLC 163-32833-00190 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:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Dirk Johnson Industrial Plastics Group LLC PO Box 608 Mt Vernon IN 47620 (Source CAATS) via confirmed delivery										
2		Barry Cox President Industrial Plastics Group LLC PO Box 608 Mt Vernon IN 47620 (RO CAATS)										
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
4		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
5		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
6		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)										
7		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
8		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)										
9		Christopher Zirkelbach Environmental & Safety Solutions 201 NW Fourth Street, Old Court House, Ste 106 Evansville IN 47708 (Consultant)										
10		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
11		Melinda Paul HSMF, LLC 12835 Saint Wendel Road Evansville IN 47720 (Affected Party)										
12		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
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