



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: December 30, 2013

RE: Decatur Plastic Products – Flocking Division / 079-33609-00021

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 6/13/13



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**New Source Construction and Federally Enforceable
State Operating Permit
OFFICE OF AIR QUALITY**

**Decatur Plastic Products - Flocking Division
655 West Montrow Industrial Parkway
North Vernon, Indiana 47265**

(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.

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

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

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

Operation Permit No.: F079-33609-00021	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 30, 2013 Expiration Date: December 30, 2018



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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary plastic interior automotive part coating plant.

Source Address:	655 West Montrow Industrial Parkway, North Vernon, Indiana 47265
General Source Phone Number:	812-346-5159
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
County Location:	Jennings
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-7-1(22)]

Decatur Plastic Product Inc.'s Flocking Division plant (source ID 079-00021) is approximately three (3) miles from Decatur Plastic Product Inc.'s injection molding plant (source ID 079-00017). Approximately ten percent of the parts produced at the injection molding plant are sent to the flocking plant for processing. IDEM, OAQ examined whether the two sources are one "major source" as defined at 326 IAC 2-7-1(22). In order for these two plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on the same, contiguous or adjacent properties.

The two plants are both owned by Decatur Plastic Products, Inc. Pursuant to IDEM Nonrule Policy Document AIR-005, Guidance on Definition of "Source" for Collocated Activities, plants that are under common ownership are also under common control. This guidance document is available at <http://www.in.gov/idem/4694.htm> on IDEM's website. Therefore, the first part of the major source definition is met.

The Standard Industrial Classification Manual of 1987 sets out how to determine the proper Standard Industrial Classification (SIC) Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. The injection molding plant makes both automotive and consumer goods. The flocking plant applies a fiber coating to automotive and consumer products produced elsewhere. Both plants have the two-digit SIC Code of 30 for the Major Group Rubber and Miscellaneous Plastic Products.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other source. Ten percent of the product from the injection molding plant goes to the flocking plant. None of the output

of the flocking plant goes to the injection molding plant. Neither plant has a support relationship with the other. Since the plants have the same two-digit SIC Code they meet the second part of the major source definition.

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

The term "adjacent" is not defined in Indiana's rules. IDEM's Nonrule Policy Document Air-005 provides guidance in determining when two properties are adjacent. Air-005 states:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

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

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

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

These questions focus on whether the separate plants are so interrelated that they are functioning as one source, and whether the distance between them is small enough that it enables them to operate as one source. U.S. EPA Assistant Administrator Gina McCarthy issued a memorandum on September 22, 2009 that confirmed U.S. EPA's view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the properties are adjacent.

There are no physical connections between the two plants. The plants have separate work forces. No managers or other staff will routinely travel between the plants. The production process is somewhat split between the plants. The flocking plant does get about 75% of the material it flocks from the molding plant. However, 90% of the molding plant's production does not require flocking. At almost three miles apart, the plants are not physically close to each other. IDEM, OAQ has determined that the two plants are not located on adjacent properties. The third part of the major source definition is not met.

The two plants do not meet all three parts of the major source definition. IDEM, OAQ finds that Decatur Plastic Product Inc.'s flocking plant and injection molding plant are not part of the same major source.

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

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

- (a) One (1) flocking line, identified as Line 1, constructed in May 2013, and consisting of the following emission units:
 - (1) One (1) primer/adhesive HVLP spray booth, identified as Primer/Adhesive Booth 1, constructed in May 2013, with a maximum capacity of 240 trim panels per hour and other automotive parts, using dry filters as control, and exhausting to Stack #1. The primer/adhesive booth utilizes high volume low pressure (HVLP) spray guns.
 - (2) One (1) flocking booth, identified as Flocking Booth 1, constructed in May 2013, with a maximum capacity of 240 trim panels per hour and other plastic automotive parts, with a process weight rate of 0.06 tons per hour, using a dust collector system, identified as CD-1, as control and exhausting indoors to a baghouse.
- (b) One (1) flocking line, identified as Line 2, approved for construction in 2013, and consisting of the following emission units:
 - (1) One (1) primer/adhesive spray booth, identified as Primer/Adhesive Booth 2, approved for construction in 2013, with a maximum capacity of 240 trim panels per hour and other automotive parts, using dry filters as control, and exhausting to Stack #2. The primer/adhesive booth utilizes high volume low pressure (HVLP) spray guns.
 - (2) One (1) flocking booth, identified as Flocking Booth 2, approved for construction in 2013, with a maximum capacity of 240 trim panels per hour and other plastic automotive parts, with a process weight rate of 0.06 tons per hour, using a dust collector system, identified as CD-1, as control and exhausting indoors to a baghouse.

Note: Dust collector system, identified as CD-1, is shared by Flocking Booth 1 and Flocking Booth 2.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) One (1) Thermo-Cycler natural gas-fired unit heater, identified as Heater 1, constructed in December 2002, with a 320,000 Btu/hr heat input rate. Heater 1 exhausts outside via Stack 4.
- (b) Paved roads and parking lots with public access.

A.5 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F079-33609-00021, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southeast Regional Office and Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

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

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F079-33609-00021 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

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

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

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

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

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

- (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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

Indianapolis, Indiana 46204-2251

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

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) flocking line, identified as Line 1, constructed in May 2013, and consisting of the following emission units:
- (1) One (1) primer/adhesive HVLP spray booth, identified as Primer/Adhesive Booth 1, constructed in May 2013, with a maximum capacity of 240 trim panels per hour and other automotive parts, using dry filters as control, and exhausting to Stack #1. The primer/adhesive booth utilizes high volume low pressure (HVLP) spray guns.
 - (2) One (1) flocking booth, identified as Flocking Booth 1, constructed in May 2013, with a maximum capacity of 240 trim panels per hour and other plastic automotive parts, with a process weight rate of 0.06 tons per hour, using a dust collector system, identified as CD-1, as control and exhausting indoors to a baghouse.
- (b) One (1) flocking line, identified as Line 2, approved for construction in 2013, and consisting of the following emission units:
- (1) One (1) primer/adhesive spray booth, identified as Primer/Adhesive Booth 2, approved for construction in 2013, with a maximum capacity of 240 trim panels per hour and other automotive parts, using dry filters as control, and exhausting to Stack #2. The primer/adhesive booth utilizes high volume low pressure (HVLP) spray guns.
 - (2) One (1) flocking booth, identified as Flocking Booth 2, approved for construction in 2013, with a maximum capacity of 240 trim panels per hour and other plastic automotive parts, with a process weight rate of 0.06 tons per hour, using a dust collector system, identified as CD-1, as control and exhausting indoors to a baghouse.

Note: Dust collector system, identified as CD-1, is shared by Flocking Booth 1 and Flocking Booth 2.

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

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

D.1.1 Hazardous Air Pollutants (HAP) [326 IAC 2-4.1] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the Permittee shall comply with the following:

- (a) The total input of any single HAP for the two (2) primer/adhesive booths, identified as Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2, shall not exceed nine and nine tenths (9.90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit any single HAP from all other emission units at this source, shall limit the source-wide total potential to emit any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2 shall be controlled by dry filters, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), particulate emissions from Flocking Booth 1 and Flocking Booth 2, shall not exceed 0.623 pounds per hour, each, when operating at a process weight rate of 0.06 tons per hour, each.

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

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

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

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

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

Compliance Determination Requirements

D.1.5 HAP [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the HAP input limit contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Particulate Control

- (a) In order to comply with Condition D.1.3, the control device associated with Flocking Booth 1 and Flocking Booth 2 shall be in operation at all times that Flocking Booth 1 and Flocking Booth 2 are in operation.
- (b) 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.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters providing control for the primer/adhesive booths. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the primer/adhesive booths stacks (Stack 1 and Stack 2) while each booth is in operation. If a condition exists which should result in a response step, the Permittee shall take a 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.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks (Stack 1 and Stack 2) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a 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.

D.1.8 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collection system used in conjunction with the flocking processes, at least once per day when the flocking process is in operation. When for any one reading, the pressure drop across the dust collection unit is outside the normal range the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 2.0 and 9.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.9 Broken or Failed Bag Detection

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

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

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

D.1.10 Record Keeping Requirements

- (a) In order to document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the single HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available not later than 30 days after the end of each compliance period.
 - (1) The single HAP content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month.
- (4) The single HAP usage for each month; and
- (5) The weight of single HAP emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its record when an inspection is not taken and the reason for the lack of inspection (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a daily records of the daily pressure drop readings across the dust collection system controlling the flocking booths. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (i.e. the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this Condition.

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Decatur Plastic Products - Flocking Division
Source Address: 655 West Montrow Industrial Parkway, North Vernon, Indiana 47265
FESOP Permit No.: F079-33609-00021

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Decatur Plastic Products - Flocking Division
Source Address: 655 West Montrow Industrial Parkway, North Vernon, Indiana 47265
FESOP Permit No.: F079-33609-00021

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Decatur Plastic Products - Flocking Division
 Source Address: 655 West Montrow Industrial Parkway, North Vernon, Indiana 47265
 FESOP Permit No.: F079-33609-00021
 Facility: Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2
 Parameter: Single HAP Emissions
 Limit: The total input of any single HAP for the two (2) primer/adhesive booths, identified as Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2, shall not exceed nine and nine tenths (9.90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

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

Source Name: Decatur Plastic Products - Flocking Division
Source Address: 655 West Montrow Industrial Parkway, North Vernon, Indiana 47265
FESOP Permit No.: F079-33609-00021

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Decatur Plastic Products - Flocking Division
655 West Montrow Industrial Parkway
North Vernon, Indiana 47265

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 Decatur Plastic Products - Flocking Division 655 West Montrow Industrial Parkway, North Vernon, Indiana 47265, completed construction of the plastic interior automotive part coating plant on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 4, 2013, and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F079-33609-00021, Plant ID No. 079-00021 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** 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 New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location
--

Source Name:	Decatur Plastic Products - Flocking Division
Source Location:	655 West Montrow Industrial Parkway, North Vernon, IN 47265
County:	Jennings
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
Operation Permit No.:	F 079-33609-00021
Permit Reviewer:	Brandon Miller

On September 4, 2013, the Office of Air Quality (OAQ) received an application from Decatur Plastic Products - Flocking Division related to the construction and operation of a new stationary plastic interior automotive part coating plant.

Source Definition

Decatur Plastic Product Inc.'s Flocking Division plant (source ID 079-00021) is approximately three (3) miles from Decatur Plastic Product Inc.'s injection molding plant (source ID 079-00017). Approximately ten percent of the parts produced at the injection molding plant are sent to the flocking plant for processing. IDEM, OAQ examined whether the two sources are one "major source" as defined at 326 IAC 2-7-1(22). In order for these two plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on the same, contiguous or adjacent properties.

The two plants are both owned by Decatur Plastic Products, Inc. Pursuant to IDEM Nonrule Policy Document AIR-005, Guidance on Definition of "Source" for Collocated Activities, plants that are under common ownership are also under common control. This guidance document is available at <http://www.in.gov/idem/4694.htm> on IDEM's website. Therefore, the first part of the major source definition is met.

The Standard Industrial Classification Manual of 1987 sets out how to determine the proper Standard Industrial Classification (SIC) Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. The injection molding plant makes both automotive and consumer goods. The flocking plant applies a fiber coating to automotive and consumer products produced elsewhere. Both plants have the two-digit SIC Code of 30 for the Major Group Rubber and Miscellaneous Plastic Products.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other source. Ten percent of the product from the injection molding plant goes to the flocking plant. None of the output of the flocking plant goes to the injection molding plant. Neither plant has a support relationship with the other. Since the plants have the same two-digit SIC Code they meet the second part of the major source definition.

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

The term "adjacent" is not defined in Indiana's rules. IDEM's Nonrule Policy Document Air-005 provides guidance in determining when two properties are adjacent. Air-005 states:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

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

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

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

These questions focus on whether the separate plants are so interrelated that they are functioning as one source, and whether the distance between them is small enough that it enables them to operate as one source. U.S. EPA Assistant Administrator Gina McCarthy issued a memorandum on September 22, 2009 that confirmed U.S. EPA's view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the properties are adjacent.

There are no physical connections between the two plants. The plants have separate work forces. No managers or other staff will routinely travel between the plants. The production process is somewhat split between the plants. The flocking plant does get about 75% of the material it flocks from the molding plant. However, 90% of the molding plant's production does not require flocking. At almost three miles apart, the plants are not physically close to each other. IDEM, OAQ has determined that the two plants are not located on adjacent properties. The third part of the major source definition is not met.

The two plants do not meet all three parts of the major source definition. IDEM, OAQ finds that Decatur Plastic Product Inc.'s flocking plant and injection molding plant are not part of the same major source.

Existing Approvals

Decatur Plastic Products - Flocking Division was issued a FESOP (F079-22584-00021) on August 9, 2006, for a stationary plastic interior automotive part coating plant. The source closed down operations and the permit was revoked (F079-27507-00021) on March 19, 2009. There have been no other approvals issued to this source. The source does not currently have a valid operating permit. Therefore, it is considered as a new source.

County Attainment Status

The source is located in Jennings County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

Jennings County is unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Jennings County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Jennings County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NO_x 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**
 Jennings County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Decatur Plastic Products - Flocking Division on September 4, 2013, relating to a stationary plastic interior automotive parts coating plant. The process for applying the coating to the various plastic automotive parts involves applying a primer (if necessary to the part) and an adhesive in a primer/adhesive spray booth. The primer and adhesive are applied in the same booth. The part is then sent to a flocking booth where nylon flock fiber is electrostatically applied before going to an electric infrared oven to dry. The parts are then cleaned and packed for shipping. Cleaning operations for the adhesive booths use acetone and no other solvents. The plant existed and operated under a previous FESOP, permit number F079-22584-00021, issued August 9, 2006. The plant closed and was issued a revocation, 079-27507-00021, on March 19, 2009. The source is operational again, prior to getting an air approval.

The following is a list of the new emission units and pollution control devices:

- (a) One (1) flocking line, identified as Line 2, approved for construction in 2013, and consisting of the following emission units:
 - (1) One (1) primer/adhesive spray booth, identified as Primer/Adhesive Booth 2, approved for construction in 2013, with a maximum capacity of 240 trim panels per hour and other automotive parts, using dry filters as control, and exhausting to Stack #2. The primer/adhesive booth utilizes high volume low pressure (HVLP) spray guns.
 - (2) One (1) flocking booth, identified as Flocking Booth 2, approved for construction in 2013, with a maximum capacity of 240 trim panels per hour and other plastic automotive parts, with a process weight rate of 0.06 tons per hour, using a dust collector system, identified as CD-1, as control and exhausting indoors to a baghouse.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) flocking line, identified as Line 1, constructed in May 2013, and consisting of the following emission units:
 - (1) One (1) primer/adhesive HVLP spray booth, identified as Primer/Adhesive Booth 1, constructed in May 2013, with a maximum capacity of 240 trim panels per hour and other automotive parts, using dry filters as control, and exhausting to Stack #1. The primer/adhesive booth utilizes high volume low pressure (HVLP) spray guns.
 - (2) One (1) flocking booth, identified as Flocking Booth 1, constructed in May 2013, with a maximum capacity of 240 trim panels per hour and other plastic automotive parts, with a process weight rate of 0.06 tons per hour, using a dust collector system, identified as CD-1, as control and exhausting indoors to a baghouse.
- (b) Insignificant activities consisting of the following:
 - (1) One (1) Thermo-Cycler natural gas-fired unit heater, identified as Heater 1, constructed in December 2002, with a 320,000 Btu/hr heat input rate. Heater 1 exhausts outside via Stack 4.
 - (2) Paved roads and parking lots with public access.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	greater than 25 tons but less than 100
PM10 ⁽¹⁾	greater than 25 tons but less than 100
PM2.5 ⁽¹⁾	greater than 25 tons but less than 100
SO ₂	Less than 5 tons
NO _x	Less than 5 tons
VOC	greater than 25 tons but less than 100
CO	Less than 5 tons
GHGs as CO ₂ e	Less than 100,000 tons

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Xylene	3.93
Toluene	17.72
Hexane	2.5E-03
Formaldehyde	1.0E-04
TOTAL HAPs	21.65

- (a) The PTE of all regulated criteria pollutants are less than one hundred (100) tons per year.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.

PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Primer/Adhesive Booth 1	14.0	14.0	14.0	0	0	19.2	0	0	10.82	9.9 Toluene ¹
Primer/Adhesive Booth 2	14.0	14.0	14.0	0	0	19.2	0	0	10.82	
Flocking Booth 1	5.76	5.76	5.76	0	0	0	0	0	0	0
Flocking Booth 2	5.76	5.76	5.76	0	0	0	0	0	0	0
Heater 1	0.003	0.01	0.01	8.2E-04	0.14	0.008	0.12	166	0.003	0.003 Hexane
Total PTE of Entire Source	39.45	39.45	39.45	0.00	0.14	38.37	0.12	166	21.65	9.9 toluene¹
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
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
 **The 100,000 CO₂e 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.
¹Compliance with this limit renders the requirements of 326 IAC 2-4.1 (Major sources of Hazardous Air Pollutants (HAP) and 326 IAC 2-7 (Part 70 Permits) not applicable.

(a) FESOP Status

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and is less than twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The total input of any single HAP for the two (2) primer/adhesive booths, identified as Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2, shall not exceed nine and nine

tenths (9.90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit any single HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

Note: The total HAPs of the source is less than 25 tons per year.

- (b) PSD Minor Source
This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all criteria pollutants is less than 250 tons per year and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). The potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not operate an automobile or light-duty truck assembly plant. This source only consists of surface coating of plastic interior automotive parts.
- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source is not located at a facility which applies topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks, is not a major source, is not located at a major source, and is not part of a major source of emissions of hazardous air pollutants (HAP). This source only consists of surface coating of plastic interior automotive parts.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (326 IAC 20-81), are not included in the permit, since this source is not a major source, located at a major source, or part of a major source of emissions of HAP.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95), are not included in the permit, since Heater 1 is not a process heater, the source is not a major source, located at a major source, or part of a major source of emissions of HAP. A process heater indirectly heats a process material. Heater 1 provides comfort heating to the facility; it does not indirectly heat a process material.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included in the permit. This area source does not perform

paint stripping using MeCl for the removal of dried paint from wood, metal, plastic, and other substrates; does not perform spray application of coatings to motor vehicles and mobile equipment; and does not perform spray applications of coatings that contain the target HAP (compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) to a plastic substrate on a part or product.

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJ, are not included in the permit. This area source does not use an industrial, commercial, or institutional boiler. Heater 1 provides comfort heating to the facility; it does not indirectly heat a process material.
- (h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the primer/adhesive booths is greater than ten (10) tons per year for any single HAP. However, the source shall limit the potential to emit of HAPs from the primer/adhesive booths to less than ten (10) tons per year for any single HAP. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

In order to render the requirements of 326 IAC 2-4.1 not applicable, the source shall be limited as follows:

- (1) The total input of any single HAP for the two (2) primer/adhesive booths, identified as Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2, shall not exceed nine and nine tenths (9.90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit any single HAP from all other emission units at this source, shall limit the source-wide total potential to emit any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

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

Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2 shall be controlled by dry particulate filters in accordance with manufacturer's specifications.
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2 are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each primer/adhesive booth is less than twenty-five (25) tons per year.
- (k) 326 IAC 8-2-2 (Automobile and Light-Duty Truck Coating Operations)
Pursuant to 326 IAC 8-2-2, Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2 are exempt from the requirements of 326 IAC 8-2-2, because the source does not coat passenger car or passenger car derivatives capable of seating twelve (12) or fewer passengers and any motor vehicle rated at 3,864 kilograms (eight thousand five hundred (8,500 pounds) gross weight or less which are designed primarily for the purpose of transportation or are derivatives of such vehicles. This source only consists of surface coating of plastic interior automotive parts, which do not meet the definition of automobiles or light duty trucks as defined in 326 IAC 8-2-2(a).
- (l) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)
The source is not subject to the requirements of 326 IAC 8-2-9 since it does not perform metal surface coating of large and small farm machinery, small household appliances, office equipment, or commercial and industrial machinery, and does not coat metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, or #39. This source performs the surface coating of plastic interior automotive parts under the Standard Industrial Classification Code of 3089 (major group #30). However the source is not located in Lake or Porter County.

- (m) 326 IAC 8-10 (Automobile Refinishing)
 The requirements of 326 IAC 8-10 apply to any person who owns, leases, operates, or controls a facility, as defined in 326 IAC 1-2-27, which refinishes motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment in any Indiana county. This facility coats vehicle components under the Standard Industrial Classification (SIC) code of 3089 (plastic products, not elsewhere classified) and not under the SIC code of 7532 (top, body, and upholstery repair shops and paint shops). The source does not perform refinishing operations for after-market motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment. Therefore, the requirements of 326 IAC 8-10 are not applicable.
- (n) 326 IAC 8-22 (Miscellaneous Industrial Adhesives)
 The source is not subject to the requirements of 326 IAC 8-22 since it is not located in Lake County or Porter County.
- (o) There are no other 326 IAC 8 Rules that are applicable to the facility.

Flocking Booth 1 and Flocking Booth 2

- (p) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-2, the particulate emissions from each flocking booth shall not exceed 0.623 pounds per hour when operating at a process weight rate of 0.06 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The dust collection system (CD-1) shall be in operation at all times the flocking booths are in operation, in order to comply with this limit.

Compliance Determination, Monitoring and Testing Requirements
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- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Primer/Adhesive Booth 1 and 2/Dry filters ¹	Filter Check	Once per day
	Overspray Observations	Once per week
	Stack Exhaust Observations	Once per month
Flocking Booth 1 and 2/CD-1 ²	Water Pressure Drop	Once per day

- (1) The monitoring conditions are necessary because the dry filters that control particulate emissions for Primer/Adhesive Booth 1 and Primer/Adhesive Booth 2 must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)
- (2) The monitoring conditions are necessary because CD-1 that controls particulate emissions for the flocking booths, Flocking Booth 1 and Flocking Booth 2, must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations).
- (b) There are no testing requirements applicable to this source. The source will demonstrate compliance with the HAP usage limits by keeping records of their total primer and adhesive usage.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 4, 2013.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. 079-33609-00021. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brandon Miller 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) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emission Calculations
Summary**

Company Name: Decatur Plastic Products - Flocking Division
Address City IN Zip: 655 West Montrow Industrial Parkway, North Vernon, IN 47265
Permit Number: F079-33609-00021
Reviewer: Brandon Miller
Date: 11/8/2013

Uncontrolled

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAP	Single HAP
	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year
Primer/Adhesive Booth 1	14.0	14.0	14.0	0	0	19.2	0	0	10.82	8.86 Toluene
Primer/Adhesive Booth 2	14.0	14.0	14.0	0	0	19.2	0	0	10.82	8.86 Toluene
Flocking Booth 1	5.76	5.76	5.76	0	0	0	0	0	0	0
Flocking Booth 2	5.76	5.76	5.76	0	0	0	0	0	0	0
Heater 1 (Combustion)	2.6E-03	1.0E-02	1.0E-02	8.2E-04	1.4E-01	7.6E-03	0.12	166	2.59E-03	2.47E-03 Hexane
Total	39.45	39.45	39.45	0.00	0.14	38.37	0.12	166	21.65	17.72 Toluene

Controlled/Limited

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	HAP	Single HAP
	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year
Primer/Adhesive Booth 1	14.0	14.0	14.0	0	0	19.2	0	0	10.82	9.90 Toluene
Primer/Adhesive Booth 2	14.0	14.0	14.0	0	0	19.2	0	0	10.82	
Flocking Booth 1	5.76	5.76	5.76	0	0	0	0	0	0	0 0.00
Flocking Booth 2	5.76	5.76	5.76	0	0	0	0	0	0	0 0.00
Heater 1 (Combustion)	2.6E-03	1.0E-02	1.0E-02	8.2E-04	1.4E-01	7.6E-03	0.12	166	2.59E-03	2.47E-03 Hexane
Total	39.45	39.45	39.45	0.00	0.14	38.37	0.12	166	21.65	9.90 Toluene

**Appendix A: Emission Calculations
Primer/Adhesive Booths PM and VOC**

Company Name: Decatur Plastic Products - Flocking Division
Address City IN Zip: 655 West Montrow Industrial Parkway, North Vernon, IN 47265
Permit Number: F079-33609-00021
Reviewer: Brandon Miller
Date: 11/8/2013

	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Trim Panel Usage	Primer	7.3	95.00%	0.0%	95.0%	0.0%	4.00%	0.0007	240.0	6.98	6.98	1.17	28.13	5.13	0.07	174.42	75%	
	Adhesive 300698	9.1	62.00%	57.0%	5.0%	64.0%	31.00%	0.0060	240.0	1.26	0.45	0.65	15.69	2.86	5.44	1.46	75%	
	Trim Panel LH/RH Total											1.83	43.82	8.00	5.51			
Tray Bin Usage	Primer	7.3	95.00%	0.0%	95.0%	0.0%	4.00%	0.0008	103.0	6.98	6.98	0.57	13.80	2.52	0.03	174.42	75%	
	Adhesive 300698	9.1	62.00%	57.0%	5.0%	64.0%	31.00%	0.0076	103.0	1.26	0.45	0.36	8.53	1.56	2.96	1.46	75%	
	Tray Bin Total											0.93	22.33	4.07	2.99			
Pocket Inner Usage	Primer	7.3	95.00%	0.0%	95.0%	0.0%	4.00%	0.0015	68.0	6.98	6.98	0.71	17.08	3.12	0.04	174.42	75%	
	Adhesive 300698	9.1	62.00%	57.0%	5.0%	64.0%	31.00%	0.0138	68.0	1.26	0.45	0.43	10.22	1.87	3.55	1.46	75%	
	Pocket Inner LH/RH Total											1.14	27.30	4.98	3.59			
Jewelry Tray Usage	Adhesive 300409	8.5	66.00%	65.0%	1.0%	67.0%	32.00%	0.0461	26.1	0.26	0.09	0.10	2.46	0.45	3.81	0.27	75%	
	Jewelry Tray Total											1.24	29.76	5.43	7.40			
Glove Box Usage	Primer	7.3	95.00%	0.0%	95.0%	0.0%	4.00%	0.0036	65.5	6.98	6.98	1.65	39.48	7.21	0.09	174.42	75%	
	Adhesive 300698	9.1	62.00%	57.0%	5.0%	64.0%	31.00%	0.0290	65.5	1.26	0.45	0.86	20.70	3.78	7.18	1.46	75%	
	Glove Box Total											2.51	60.18	10.98	7.27			
GB Door Usage	Primer	7.3	95.00%	0.0%	95.0%	0.0%	4.00%	0.0017	83.7	6.98	6.98	0.99	23.83	4.35	0.06	174.42	75%	
	Adhesive 300698	9.1	62.00%	57.0%	5.0%	64.0%	31.00%	0.0137	83.7	1.26	0.45	0.52	12.49	2.28	4.33	1.46	75%	
	GB Door Total											1.51	36.32	6.63	4.39			
GB Frame Usage	Primer	7.34	0.95	0.0%	95.0%	0.0%	4.00%	0.0045	68.0	6.98	6.98	2.13	51.24	9.35	0.12	174.42	75%	
	Adhesive 300698	9.1	62.00%	57.0%	5.0%	64.0%	31.00%	0.0200	68.0	1.26	0.45	0.62	14.82	2.70	5.14	1.46	75%	
	GB Frame Total											2.75	66.06	12.06	5.26			
Console Bin Assy Usage	Primer	7.3	95.00%	0.0%	95.0%	0.0%	4.00%	0.0060	65.0	6.98	6.98	2.72	65.30	11.92	0.16	174.42	75%	
	Adhesive 300409	9.1	62.00%	57.0%	5.0%	64.0%	31.00%	0.0562	65.0	1.26	0.45	1.66	39.80	7.26	13.80	1.46	75%	
	Console Bin Assy Total											4.38	105.11	19.18	13.96			
																		Controlled Particulate
	Total Potential to Emit per Primer/Adhesive Booth											4.38	105.11	19.18	13.96	0.70		
												lbs/hr	lbs/hr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
METHODOLOGY	Total Potential to Emit for all Primer/Adhesive Booths											8.76	210.21	38.36	27.92	1.40		
												lbs/hr	lbs/hr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total Potential to Emit per Primer/Adhesive Booth = highest usage amongst the potential parts
*The worst case for one part is being used because combining the emissions for all the parts would imply that each booth is capable of manufacturing multiple parts at the same time which they cannot.
Total Potential to Emit for all Primer/Adhesive Booths = Total Potential to Emit per Primer/Adhesive Booth * number of primer/adhesive booths (2 booths total)
Controlled Particulate Tons per Year = Particulate Potential (tons/year) * (1 - Dry Filter Efficiency) where the Dry Filter Efficiency is 95%

**Appendix A: Emission Calculations
Primer/Adhesive Booths HAP**

Company Name: Decatur Plastic Products - Flocking Division
Address City IN Zip: 655 West Montrow Industrial Parkway, North Vernon, IN 47265
Permit Number: F079-33609-00021
Reviewer: Brandon Miller
Date: 11/8/2013

Part being coated	Material used	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum throughput (unit/hour)	Weight % Xylene	Weight % Toluene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)
Trim Panel Usage	Primer	7.344	0.00070	240	6.00%	90.00%	0.32	4.86
	Adhesive 300698	9.079802	0.00600	240	2.00%	0.00%	1.15	0.00
	Trim Panel LH/RH Total				0.00%	0.00%	1.47	4.86
Tray Bin Usage	Primer	7.344	0.00080	103	6.00%	90.00%	0.16	2.39
	Adhesive 300698	9.079802	0.00760	103	2.00%	0.00%	0.62	0.00
	Tray Bin Total				0.00%	0.00%	0.78	2.39
Pocket Inner Usage	Primer	7.344	0.00150	68	6.00%	90.00%	0.20	2.95
	Adhesive 300698	9.079802	0.01380	68	2.00%	0.00%	0.75	0.00
	Pocket Inner LH/RH Total				0.00%	0.00%	0.94	2.95
Jewelry Tray Usage	Adhesive 300409	8.503969	0.04610	26	0.00%	0.00%	0.00	0.00
	Jewelry Tray Total						0.00	0.00
Glove Box Usage	Primer	7.34	0.00360	66	6.00%	90.00%	0.46	6.83
	Adhesive 300698	9.08	0.02900	66	2.00%	0.00%	1.51	0.00
	Glove Box Total						1.97	6.83
GB Door Usage	Primer	7.34	0.00	84	6.00%	90.00%	0.27	4.12
	Adhesive 300698	9.08	0.01	84	2.00%	0.00%	0.91	0.00
	GB Door Total						1.19	4.12
GB Frame Usage	Primer	7.34	0.00450	68	6.00%	90.00%	0.59	8.86
	Adhesive 300698	9.08	0.02000	68	2.00%	0.00%	1.08	0.00
	GB Frame Total						1.67	8.86
Console Bin Assy Usage	Primer	7.34	0.00600	65	0.00%	0.00%	0.00	0.00
	Adhesive 300409	9.08	0.05620	65	0.00%	0.00%	0.00	0.00
	Console Bin Assy Total						0.00	0.00

Greatest Potential Emissions (tons/year) per primer/adhesive booth	1.97	8.86
Greatest Potential Emissions (tons/year) for All Primer/Adhesive Booths	3.93	17.72

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 (Item being flocked) Total = (Item Being Flocked) xylene emissions (tons/yr) + (Item Being Flocked) toluene emissions (tons/yr)

Greatest Potential Emissions per primer/adhesive booth is the highest value based on the item total

Greatest Potential Emissions for All Primer/Adhesive Booths = Greatest Potential Emissions per primer/adhesive booth * total number of primer/adhesive booths (2)

**Appendix A: Emission Calculations
Flocking Booths**

Company Name: Decatur Plastic Products - Flocking Division
Address City IN Zip: 655 West Montrow Industrial Parkway, North Vernon, IN 47265
Permit Number: F079-33609-00021
Reviewer: Brandon Miller
Date: 11/8/2013

	Particulate Collected Daily per booth (lb/8 hour shift)	Particulate Collected (lb/hr)	Control Efficiency	Uncontrolled PM (lb/hr)	Uncontrolled PM (tons/yr)	Controlled PM (tons/yr)	Controlled PM (lb/hr)
Flocking Booth 1	10	1.25	95%	1.316	5.763	0.288	0.066
Flocking Booth 2	10	1.25	95%	1.316	5.763	0.288	0.066

Note: PM emissions are equivalent to PM10 and PM2.5 emissions.

Methodology:

Particulate Collected Daily for two booths (lb/8 hour shift) = 20 lbs

Particulate Collect Daily per booth (lb/8 hr shift)= 20 lbs/2 booths = 10 lbs

Particulate Collected (lb/hr) = Particulate Collected Daily per booth (lb/8hour shift) * (8 hr shift/8 hr)

Uncontrolled PM (lb/hr) = Particulate collected (lb/hr)/Control Efficiency

Uncontrolled PM (tons/yr) = Uncontrolled PM (lb/hr)*(24 hr/1 day)*(365 days/1 yr)*(1 ton/2000 lb)

Controlled PM (ton/yr) = Uncontrolled PM (tons/year)*(1 - Control Efficiency)

Controlled PM (lb/hr) = Controlled PM (ton/yr) * (1 year/365 days) * (1 day/24 hr) * (2000 lb/1 ton)

Appendix A: Emissions Calculations
Natural Gas Combustion Only, Heater 1
MM BTU/HR <100

Company Name: Decatur Plastic Products - Flocking Division
Address City IN Zip: 655 West Monrow Industrial Parkway, North Vernon, IN 47265
Permit Number: F079-33609-00021
Reviewer: Brandon Miller
Date: 11/8/2013

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.32	1020	2.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	2.6E-03	1.0E-02	1.0E-02	8.2E-04	1.4E-01	7.6E-03	1.2E-01

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

HAPS Calculations

HAPs - Organics						
Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.9E-06	1.6E-06	1.0E-04	2.5E-03	4.7E-06	2.6E-03

HAPs - Metals						
Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	6.9E-07	1.5E-06	1.9E-06	5.2E-07	2.9E-06	7.5E-06
	Total HAPs					2.6E-03

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

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

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	164.9	3.16E-03	3.02E-03
Summed Potential Emissions in tons/yr	164.9		
CO2e Total in tons/yr	165.9		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21)

+ N2O Potential Emission ton/yr x N2O GWP (310).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

Thomas W. Easterly
Commissioner

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

TO: Andy Cersarski
Decatur Plastic Products – Flocking Division
PO Box 1079
North Vernon, IN 47265

DATE: December 30, 2013

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

SUBJECT: Final Decision
New Source Construction and Federally Enforceable State Operating Permit (FESOP)
079-33609-00021

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:
Becky Gillenwater, CFO
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

December 30, 2013

TO: Jennings County Public Library

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

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

Applicant Name: Decatur Plastic Products – Flocking Division
Permit Number: 079-33609-00021

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 12/30/2013 Decatur Plastic Products Flocking Division 079-33609-00021 FINAL			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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											Remarks
1		Andy Cersarski Decatur Plastic Products Flocking Division PO Box 1079 North Vernon IN 47265 (Source CAATS) Confirmed Delivery									
2		Becky Gillenwater CFO Decatur Plastic Products Flocking Division PO Box 1079 North Vernon IN 47265 (RO CAATS)									
3		North Vernon City Council and Mayors Office 275 Main Street North Vernon IN 47265 (Local Official)									
4		Jennings Co Public Library 2375 N. State Hwy 3 North Vernon IN 47265-7483 (Library)									
5		Jennings County Commissioners Jennings County Courthouse Vernon IN 47282 (Local Official)									
6		Jennings County Health Department 200 E. Brown St, Courthouse Annex, P.O. Box 323 Vernon IN 47282-0323 (Health Department)									
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