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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for King Systems Corporation in Hamilton County

Significant Source Modification No. 057-34164-00067
Significant Permit Modification No. 057-34175-00067

The Indiana Department of Environmental Management (IDEM) has received an application from King Systems Corporation located at 15011 Herriman Boulevard, Noblesville, Indiana 46060 for a significant modification of its Part 70 Operating Permit issued on October 31, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow King Systems Corporation to make certain changes at its existing source. King Systems Corporation has applied to construct and operate four (4) new breathing circuits manufacturing assembly lines.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed or removed. These corrections, changes, and removals may include Title I changes. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

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

Noblesville Southeastern Public Library
One Library Plaza
Noblesville, IN 46060-2897

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you

do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number 057-34164-00067 or 057-34175-00067 in all correspondence.

Comments should be sent to:

Sarah Street
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 2-8427
Or dial directly: (317) 232-8427
Fax: (317)-232-6749 attn: Sarah Street
E-mail: sstreet@idem.in.gov

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

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

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 2251.

If you have any questions please contact Sarah Street of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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DRAFT

Mr. Kevin Gould
King Systems Corporation
15011 Herriman Boulevard
Noblesville, Indiana 46060

Re: 057-34164-00067
Significant Source Modification

Dear Mr. Gould:

King Systems Corporation was issued Part 70 Operating Permit Renewal No. T057-31700-00067 on October 31, 2012 for a stationary plastic medical device manufacturing source located at 15011 Herriman Boulevard, Noblesville, Indiana 46060. An application to modify the source was received on February 10, 2014. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source (listed in the same way as Section A of the Part 70 permit):

(b) One (1) Breathing Circuits manufacturing assembly line, identified as EU09, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU09A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1B.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU09B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1B.

Note: Work stations EU09A, EU09B, EU10A, and EU10B share a common vent, V-1B.

(c) One (1) Breathing Circuits manufacturing assembly line, identified as EU10, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU10A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1B.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU10B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1B.

Note: Work stations EU09A, EU09B, EU10A, and EU10B share a common vent, V-1B.

(d) One (1) Breathing Circuits manufacturing assembly line, identified as EU11, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU11A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1C.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU11B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1C.

Note: Work stations EU11A, EU11B, EU12A, and EU12B share a common vent, V-1C.

(e) One (1) Breathing Circuits manufacturing assembly line, identified as EU12, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU12A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1C.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction , identified as EU12B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1C.

Note: Work stations EU11A, EU11B, EU12A, and EU12B share a common vent, V-1C.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions on this matter, please contact Sarah Street of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Sarah Street or extension 2-8427 or dial (317) 232-8427.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

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

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Commissioner

DRAFT

Significant Source Modification

OFFICE OF AIR QUALITY

King Systems Corporation
15011 Herriman Boulevard
Noblesville, Indiana 46060

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 057-34164-00067	
Issued by: Iryn Calilung, Section Chief, Permits Branch Office of Air Quality	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary plastic medical device manufacturing source.

Source Address:	15011 Herriman Boulevard, Noblesville, Indiana 46060
General Source Phone Number:	317-776-6823
SIC Code:	3089 (Plastics Products)
County Location:	Hamilton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) Breathing Circuits manufacturing assembly line, identified as unit EU04, consisting of the following:

(1) One (1) work cell where anesthesia circuits are assembled with Methylene Chloride applied by hand, constructed in 1990, identified as unit EU04A, with a maximum capacity of 2.60 pounds of Methylene Chloride per hour, and exhausting to vent V-1.

(2) One (1) work cell where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol applied by hand, constructed in 1990, identified as unit EU04B, with a total maximum capacity of 0.59 pounds of Isopropyl Alcohol per hour and exhausting to vent V-1.

(b) One (1) Breathing Circuits manufacturing assembly line, identified as EU09, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU09A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1B.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU09B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1B.

Note: Work stations EU09A, EU09B, EU10A, and EU10B share a common vent, V-1B.

(c) One (1) Breathing Circuits manufacturing assembly line, identified as EU10, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU10A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1B.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU10B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1B.

Note: Work stations EU09A, EU09B, EU10A, and EU10B share a common vent, V-1B.

(d) One (1) Breathing Circuits manufacturing assembly line, identified as EU11, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU11A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1C.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU11B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1C.

Note: Work stations EU11A, EU11B, EU12A, and EU12B share a common vent, V-1C.

(e) One (1) Breathing Circuits manufacturing assembly line, identified as EU12, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU12A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1C.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction , identified as EU12B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1C.

Note: Work stations EU11A, EU11B, EU12A, and EU12B share a common vent, V-1C.

(f) One (1) assembly area consisting of the following:

(1) One (1) station where a U.V. glue is applied by hand, constructed in 1990, identified as unit EU05A, with a maximum capacity of 5.69 pounds of U.V. glue per hour, and exhausting to vent V-2.

(2) One (1) station where a plastic adhesive is applied by hand, constructed in 1990, identified as unit EU05B, with a maximum capacity of 6.58E-03 pounds of plastic adhesive per hour, and exhausting to vent V-2.

(g) Two (2) breathing bag production dip lines, identified as EU-08, constructed in 2011, producing mask breathing bags at maximum rate of 40 parts per minute, consisting of:

(1) Two (2) dipping areas, including:

(A) Two (2) latex coagulant dip tanks and

(B) Four (4) polymer dip tanks,

(2) Two (2) water rinse areas,

(3) Four (4) laundry areas, consisting of:

(A) Six (6) 0.2 MMBtu/hr natural gas-fired dryers and

(B) Two (2) 1.4 MMBtu/hr natural gas-fired ovens,

(4) One (1) cooling area,

(5) One (1) 1.04 MMBtu/hr natural gas-fired boiler, and

(6) One (1) 1.2 MMBtu/hr natural gas-fired water heater,

with the dipping and cooling area emissions exhausted through Vent V-3 and the oven, dryer, and boiler emissions exhausted through vent V-4.

(h) One (1) automated flex line, used for attaching plastic adaptors to plastic hoses using methylene chloride, identified as EU04C, constructed in 2011, with a maximum usage rate 1.1 pounds of methylene chloride per hour, and exhausting to vent V-1A.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source has the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Seventeen (17) plastic scrap grinding machines, constructed in 1990, identified as units EU03A through EU03Q, with a total maximum capacity of 0.16 tons of plastic per hour (19.2 pound per hour each).

(b) Five (5) plastic extruders, constructed in 1990, identified as units EU01A through EU01E, with a total maximum capacity of 0.18 tons of resin per hour.

(c) Seventeen (17) plastic injection molding machines, constructed in 1990, identified as units EU02A through EU02Q, with a total maximum capacity of 0.16 tons of resin per hour.

(d) One (1) resin storage silo, constructed in 1990, identified as unit EU06, with a maximum capacity of 0.34 tons of resin per hour.

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

(e) Resin handling operations, constructed in 1990, with potential particulate emissions less

than five (5) pounds per hour or twenty-five (25) pounds per day. [326IAC 6-3-2]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T057-31700-00067, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), 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) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.11 Emergency Provisions [326 IAC 2-7-16]

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

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

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

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

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

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

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

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

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

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

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

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

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

(a) All terms and conditions of permits established prior to T057-31700-00067 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

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

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

The Permittee shall not operate an incinerator 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.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

(a) 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. 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 2-7-5][326 IAC 2-7-6]

C.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.12 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Part 70 permit.

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 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

C.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:

Insignificant Activities

(e) Resin handling operations, constructed in 1990, with potential particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day. [326 IAC 6-3-2]

(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 2-7-5(1)]

D.1.1 Particulate Emission Limitation [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2(e), when operating at a process weight rate less than sixty thousand (60,000) pounds per hour, the allowable particulate emission rate shall be calculated by the following:

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

$E = 4.10\ P^{0.67}$

Where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(g) Two (2) breathing bag production dip lines, identified as EU-08, constructed in 2011, producing mask breathing bags at maximum rate of 40 parts per minute, consisting of:

(1) Two (2) dipping areas, including:

(A) Two (2) latex coagulant dip tanks and

(B) Four (4) polymer dip tanks,

(2) Two (2) water rinse areas,

(3) Four (4) laundry areas, consisting of:

(A) Six (6) 0.2 MMBtu/hr natural gas-fired dryers and

(B) Two (2) 1.4 MMBtu/hr natural gas-fired ovens,

(4) One (1) cooling area,

(5) One (1) 1.04 MMBtu/hr natural gas-fired boiler, and

(6) One (1) 1.2 MMBtu/hr natural gas-fired water heater,

with the dipping and cooling area emissions exhausted through Vent V-3 and the oven, dryer, and boiler emissions exhausted through vent V-4.

(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 2-7-5(1)]

D.2.1 Particulate Emission Limitation [326 IAC 6-2]

Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the boiler, ovens and dryers shall not exceed 0.6 lb/MMBtu.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: King Systems Corporation
Source Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Part 70 Permit No.: T057-31700-00067

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: King Systems Corporation
Source Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Part 70 Permit No.: T057-31700-00067

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

□ This is an emergency as defined in 326 IAC 2-7-1(12)

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

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

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Source Name: King Systems Corporation
Source Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Part 70 Permit No.: T057-31700-00067

Months: _____ to _____ Year: _____

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**King Systems Corporation**
Source Location:	**15011 Herriman Boulevard, Noblesville, Indiana 46060**
County:	**Hamilton**
SIC Code:	**3089 (Plastics Products)**
Operation Permit No.:	**T057-31700-00067**
Operation Permit Issuance Date:	**October 31, 2012**
Significant Source Modification No.:	**057-34164-00067**
Significant Permit Modification No.:	**057-34175-00067**
Permit Reviewer:	**Sarah Street**

On February 10, 2014, the Office of Air Quality (OAQ) received an application from King Systems Corporation related to a modification to an existing stationary plastic medical device manufacturing source.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T057-31700-00067 on October 31, 2012. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Hamilton County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective July 11, 2013, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

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

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

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

Fugitive Emissions

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

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by King Systems Corporation on February 10, 2014, relating to the construction and operation of four (4) new breathing circuits manufacturing assembly lines (similar to the existing breathing circuits manufacturing lines), the removal of the mask production line (EU-07), and the modification of various emission unit and vent ID descriptive information.

The breathing circuits manufacturing assembly lines are used to assemble anesthesia circuits. Methylene Chloride is used to fuse the plastic of the face mask to the plastic of the hose. The end of the hose is wiped with Methylene Chloride and inserted into the mask. The Methylene Chloride dissolves and fuses the plastic from the hose to the plastic of the face mask; the Methylene Chloride evaporates off and no residue is left behind. Isopropyl Alcohol (IPA) is used to clean the face masks. King Systems Corporation uses existing injection molding operations to manufacture the plastic face masks, and existing extrusion operations to manufacture the plastic hoses. No changes to these existing operations are being made with this modification. No changes are being made to the production capacity of the existing facilities.

Methylene Chloride is considered a hazardous air pollutant (HAP), but is not considered a VOC. Isopropyl Alcohol (IPA) is considered a VOC, but is not considered a HAP.

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

(a) One (1) Breathing Circuits manufacturing assembly line, identified as EU09, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU09A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1B.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU09B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1B.

Note: Work stations EU09A, EU09B, EU10A, and EU10B share a common vent, V-1B.

(b) One (1) Breathing Circuits manufacturing assembly line, identified as EU10, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU10A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1B.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU10B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1B.

Note: Work stations EU09A, EU09B, EU10A, and EU10B share a common vent, V-1B.

(c) One (1) Breathing Circuits manufacturing assembly line, identified as EU11, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU11A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1C.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU11B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1C.

Note: Work stations EU11A, EU11B, EU12A, and EU12B share a common vent, V-1C.

(d) One (1) Breathing Circuits manufacturing assembly line, identified as EU12, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU12A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1C.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction , identified as EU12B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1C.

Note: Work stations EU11A, EU11B, EU12A, and EU12B share a common vent, V-1C.

The following is a list of the emission unit(s) being removed with this modification:

Note: This emission unit is currently listed as item (c) in Section A.2 - Emission Units and Pollution Control Equipment Summary.

(c) One (1) mask production line, identified as EU-07, approved in 2011 for construction, consisting of one (1) PVC fill area, one (1) mask mold curing area, one (1) mask piercing area, one (1) crown application area, one (1) check valve application area and one (1) off-loading area, producing medical masks at a maximum rate of 30 masks per minute, with emissions exhausted through vent V-2.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

IDEM has reviewed the PTE calculations submitted by the source and determined them to be complete for the purpose of the proposed modification approval. See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

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

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

	Unlimited PTE of the Proposed Modification (tons/year)									
Process/ Emission Unit	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
EU09A	0	0	0	0	0	0	0	0	3.25	3.25 Methylene Chloride*
EU09B	0	0	0	0	0	0.74	0	0	0	0
EU10A	0	0	0	0	0	0	0	0	3.25	3.25 Methylene Chloride*
EU10B	0	0	0	0	0	0.74	0	0	0	0
EU11A	0	0	0	0	0	0	0	0	3.25	3.25 Methylene Chloride*
EU11B	0	0	0	0	0	0.74	0	0	0	0
EU12A	0	0	0	0	0	0	0	0	3.25	3.25 Methylene Chloride*
EU12B	0	0	0	0	0	0.74	0	0	0	0
Total PTE of Proposed Modification	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.98**	**0.00**	**0.00**	**13.00**	**13.00 Methylene Chloride***

*Pursuant to 40 CFR 51.100(s), Methylene Chloride is not a VOC.

See Appendix A for detailed emissions calculations.

(a) Significant Source Modification – approval to construct

This source modification is considered a significant source modification pursuant to 326 IAC 2-7-10.5(g)(6), because the modification has a PTE greater than 10 tons per year of a single HAP as defined under Section 112(b) of the Clean Air Act.

(b) Significant Permit Modification – approval to operate

This permit modification is considered a significant permit modification, pursuant to 326 IAC 2-7-12(d)(1), because this modification does not qualify as a minor permit modification or administrative amendment, and includes significant changes in existing monitoring Part 70 permit terms and conditions as well as significant changes to reporting or record keeping permit terms and conditions. Further, this modification requires a case-by-case determination of an emission limitation or other standard (e.g. PSD Minor limit).

Permit Level Determination – PSD of the Proposed Modification

See Appendix A for detailed emissions calculations.

This source is an existing Minor Source under PSD Rules. This modification is considered a minor modification under PSD because with the addition of the new lines, the PTE of the entire source is still less than the PSD Major Source Threshold (see table below).

PSD Major Source Status of the Source

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

Process/ Emission Unit		Potential To Emit of the Entire Source After Issuance of Modification (tons/year)									
		PM	PM10*	PM2.5*	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Breathing Circuits Manufacturing Assembly Lines	EU04A	0	0	0	0	0	0	0	0	11.37	11.37 Methylene Chloride
	EU04B	0	0	0	0	0	2.58	0	0	0	0
	EU05A	0	0	0	0	0	15.71	0	0	1.25	1.25 Acrylic Acid
	EU05B	0	0	0	0	0	0.02	0	0	3.74E-03	3.74E-03 Styrene
	EU09A	0	0	0	0	0	0	0	0	3.25	3.25 Methylene Chloride
	EU09B	0	0	0	0	0	0.74	0	0	0	0
	EU10A	0	0	0	0	0	0	0	0	3.25	3.25 Methylene Chloride
	EU10B	0	0	0	0	0	0.74	0	0	0	0
	EU11A	0	0	0	0	0	0	0	0	3.25	3.25 Methylene Chloride
	EU11B	0	0	0	0	0	0.74	0	0	0	0
	EU12A	0	0	0	0	0	0	0	0	3.25	3.25 Methylene Chloride
	EU12B	0	0	0	0	0	0.74	0	0	0	0
Breathing Bag Production Dip Lines	EU08	0	0	0	0	0	0.86	0	0	0	0
Combustion		0.05	0.21	0.21	0.02	2.81	0.15	2.36	3,391	0.05	0.05 Hexane
Automated Flex Line	EU04C	0	0	0	0	0	0	0	0	4.82	4.82 Methylene Chloride
Seventeen (17) Plastic Scrap Grinding Machines	EU03A through EU03Q	1.42	1.42	1.42	0	0	0	0	0	0	0
Five (5) Plastic Extruders	EU01A through EU01E	1.54E-03	1.54E-03	1.54E-03	0	0	0.20	0	0	2.78E-04	2.78E-04 Ethylene Vinyl Acetate (EVA)
Seventeen (17) Injection Molding Machines	EU02A through EU02Q	0	0	0	0	0	0.27	0	0	0.22	0.22 Acrylonitrile Butadiene Styrene (ABS)
Resin Storage Silo	EU06	1.19	1.19	1.19	0	0	0	0	0	0	0
Resin Handling Operations		4.56	4.56	4.56	0.00	0	0	0	0	0	0
Total PTE of Entire Source		**7.23**	**7.39**	**7.39**	**0.02**	**2.81**	**22.78**	**2.36**	**3,391**	**30.71**	**29.19 Methylene Chloride**
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

*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 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS):

(a) There are no new NSPS (326 IAC 12 and 40 CFR Part 60) included in the permit due to this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(b) There are no new NESHAPs included in the permit (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) due to this proposed modification.

Compliance Assurance Monitoring (CAM)

(c) Pursuant to 40 CFR 64.2, CAM is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Emission Unit	Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU09A	HAPs	N	-	-	-	-	N	-
EU09B	VOC	N	-	-	-	-	N	-
EU10A	HAPs	N	-	-	-	-	N	-
EU10B	VOC	N	-	-	-	-	N	-
EU11A	HAPs	N	-	-	-	-	N	-
EU11B	VOC	N	-	-	-	-	N	-
EU12A	HAPs	N	-	-	-	-	N	-
EU12B	VOC	N	-	-	-	-	N	-

The new Breathing Circuits manufacturing assembly lines are not equipped with any control equipment. Therefore, CAM requirements do not apply to these assembly lines.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

(a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the Permit Level Determination – PSD section.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
Pursuant to 40 CFR 63.41 (Subpart B) [326 IAC 2-4.1-1(c)], this rule applies to a source that installs at any developed site a new process or production unit which in and of itself emits or has the potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAP

Each of the proposed new Breathing Circuits manufacturing assembly lines is considered a production unit and will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for total HAPs. Therefore, 326 IAC 2-4.1 does not apply to this modification.

(c) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
Each of the proposed new Breathing Circuits manufacturing assembly lines has potential VOC emissions of less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to each of the assembly lines.

(d) 326 IAC 8 Rules (VOCs)
There are no VOC Rules that apply to the new manufacturing assembly lines.

Compliance Determination, Monitoring and Testing Requirements

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

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

(a) There are no compliance determination and monitoring requirements applicable to this proposed modification.

(b) There are no testing requirements applicable to this proposed modification.

Proposed Changes

(a) The following changes listed below are due to the proposed revision:

(1) Section A.1 - General Information has been updated to reflect the attainment status of Hamilton County.

(2) Section A.2 has been updated with the equipment descriptive information changes requested by the source as well as the new emission units being added with this modification.

(3) Sections D.1 and D.2 have been updated with equipment descriptive information changes.

(b) IDEM, OAQ has also decided to make the following changes to the permit:

(1) On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326

IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition. The rule site for responsible official has changed from 326 IAC 2-7-1(34) to 326 IAC 2-7-1(35).

(2) IDEM clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

(3) IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.

(4) IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

...

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a ~~stationary~~ stationary plastic medical device manufacturing source.

Source Address:	15011 Herriman Boulevard, Noblesville, Indiana 46060
General Source Phone Number:	317-776-6823
SIC Code:	3089 **(Plastics Products)**
County Location:	Hamilton
Source Location Status:	~~Nonattainment for PM2.5 standard~~ Attainment for all ~~other~~ criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD ~~and Emission Offset~~ Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) ~~circuit line~~ **Breathing Circuits manufacturing assembly line,** identified as unit EU04, consisting of the following:

(1) One (1) ~~station~~ **work cell** where ~~plastic masks are attached to plastic hoses using~~ **anesthesia circuits are assembled with** Methylene Chloride applied by hand, constructed in 1990, identified as unit EU04A, with a maximum capacity of 2.60 pounds of Methylene Chloride per hour, and exhausting to vent V-1.

(2) One (1) ~~station~~ **work cell** where the assembled ~~masks~~ **anesthesia circuits** are cleaned using Isopropyl Alcohol applied by hand, constructed in 1990, identified as unit EU04B, with a total maximum capacity of 0.59 pounds of Isopropyl Alcohol per hour and exhausting to vent V-1.

(b) One (1) Breathing Circuits manufacturing assembly line, identified as EU09, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU09A, with a maximum capacity of 0.742 pounds of

Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1B.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU09B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1B.

Note: Work stations EU09A, EU09B, EU10A, and EU10B share a common vent, V-1B.

(c) One (1) Breathing Circuits manufacturing assembly line, identified as EU10, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU10A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1B.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU10B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1B.

Note: Work stations EU09A, EU09B, EU10A, and EU10B share a common vent, V-1B.

(d) One (1) Breathing Circuits manufacturing assembly line, identified as EU11, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU11A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1C.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction, identified as EU11B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1C.

Note: Work stations EU11A, EU11B, EU12A, and EU12B share a common vent, V-1C.

(e) One (1) Breathing Circuits manufacturing assembly line, identified as EU12, consisting of the following:

(1) One (1) work station where anesthesia circuits are assembled with Methylene Chloride applied by hand, approved in 2014 for construction, identified as EU12A, with a maximum capacity of 0.742 pounds of Methylene Chloride per hour, with emissions uncontrolled, and exhausting to vent V-1C.

(2) One (1) work station where the assembled anesthesia circuits are cleaned using Isopropyl Alcohol, approved in 2014 for construction , identified as EU12B, with a maximum capacity of 0.17 pounds of Isopropyl Alcohol per hour, with emissions uncontrolled, and exhausting to vent V-1C.

Note: Work stations EU11A, EU11B, EU12A, and EU12B share a common vent, V-1C.

~~(b)~~**(f)** One (1) assembly area consisting of the following:

(1) One (1) station where a U.V. glue is applied by hand, constructed in 1990, identified as unit EU05A, with a maximum capacity of 5.69 pounds of U.V. glue per hour, and exhausting to vent ~~V-1~~ **V-2**.

(2) One (1) station where a plastic adhesive is applied by hand, constructed in 1990, identified as unit EU05B, with a maximum capacity of 6.58E-03 pounds of plastic adhesive per hour, and exhausting to vent ~~V-1~~ **V-2**.

~~(c) One (1) mask production line, identified as EU-07, approved in 2011 for construction, consisting of one (1) PVC fill area, one (1) mask mold curing area, one (1) mask piercing area, one (1) crown application area, one (1) check valve application area and one (1) off-loading area, producing medical masks at a maximum rate of 30 masks per minute, with emissions exhausted through vent V-2.~~

~~(d)~~**(g)** Two (2) breathing bag production dip lines, identified as EU-08, ~~approved in 2011 for construction~~ **constructed in 2011**, **producing mask breathing bags at maximum rate of 40 parts per minute,** consisting of**:**

(1) ~~two~~ **Two** (2) dipping areas**,** including**:**

(A) ~~two~~ **Two** (2) latex coagulant dip tanks and

(B) ~~four~~ **Four** (4) polymer dip tanks,

(2) ~~two~~ **Two** (2) water rinse areas,

(3) ~~four~~ **Four** (4) laundry areas**,** consisting of**:**

(A) ~~six~~ **Six** (6) 0.2 MMBtu/hr natural gas-fired dryers and

(B) ~~two~~ **Two** (2) 1.4 MMBtu/hr natural gas-fired ovens,

(4) ~~one~~ **One** (1) cooling area,

(5) ~~one~~ **One** (1) 1.04 MMBtu/hr natural gas-fired boiler, and

(6) ~~one~~ **One** (1) 1.2 MMBtu/hr natural gas-fired water heater, ~~producing mask breathing bags at maximum rate of 40 parts per minute,~~

with the dipping and cooling area emissions exhausted through Vent V-3 and the oven, dryer, and boiler emissions exhausted through vent V-4.

~~(e)~~**(h)** One (1) automated flex line, used for attaching plastic adaptors to plastic hoses using methylene chloride, identified as EU04C, constructed in 2011, with a maximum usage rate 1.1 pounds of methylene chloride per hour, and exhausting to vent V-1**A**.

...

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**, 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) A "responsible official" is defined at 326 IAC 2-7-1~~(34)~~**(35)**.

...

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

...

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

...

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

...

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

...

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

B.11 Emergency Provisions [326 IAC 2-7-16]

...

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

...

(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:

...

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

...

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

...

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

...

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

...

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

...

(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:

...

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

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

...

(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:

...

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

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

(a) ...

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

...

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 ~~or of initial start-up, whichever is later,~~ to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance ~~or the date of initial startup, whichever is later,~~ the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**.

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

...

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

...

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**~~(35)~~**.

...

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

...

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**~~(35)~~**.

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Part 70 permit.

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 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1~~(34)~~**(35)**. A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(e) Resin handling operations, constructed in 1990, with potential particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day. [326 IAC 6-3-2]

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

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

~~(b)~~ **(g)** Two (2) breathing bag production dip lines, identified as EU-08, ~~approved in 2011 for construction~~ **constructed in 2011**, **producing mask breathing bags at maximum rate of 40 parts per minute,** consisting of**:**

(1) ~~two~~ **Two** (2) dipping areas**,** including**:**

(A) ~~two~~ **Two** (2) latex coagulant dip tanks and

(B) ~~four~~ **Four** (4) polymer dip tanks,

(2) ~~two~~ **Two** (2) water rinse areas,

(3) ~~four~~ **Four** (4) laundry areas**,** consisting of**:**

(A) ~~six~~ **Six** (6) 0.2 MMBtu/hr natural gas-fired dryers and

(B) ~~two~~ **Two** (2) 1.4 MMBtu/hr natural gas-fired ovens,

(4) ~~one~~ **One** (1) cooling area,

(5) ~~one~~ **One** (1) 1.04 MMBtu/hr natural gas-fired boiler, and

(6) ~~one~~ **One** (1) 1.2 MMBtu/hr natural gas-fired water heater, ~~producing mask breathing bags at maximum rate of 40 parts per minute,~~

with the dipping and cooling area emissions exhausted through Vent V-3 and the oven, dryer, and boiler emissions exhausted through vent V-4.

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

...

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 057-34164-00067 and Significant Permit Modification No. 057-34175-00067. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.

(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
Emissions Summary

Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

			Unlimited Potential to Emit (tons/year)										
			Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
Process Description / Emission Unit		Year of Construction	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	CO2e	Total HAPs	Worst Single HAP	
Breathing Circuits Manufacturing Assembly Lines	EU04A	1990	0	0	0	0	0	0	0	0	11.37	11.37	Methylene Chloride
	EU04B	1990	0	0	0	0	0	2.58	0	0	0	0	
	EU05A	1990	0	0	0	0	0	15.71	0	0	1.25	1.25	Acrylic Acid
	EU05B	1990	0	0	0	0	0	0.02	0	0	3.74E-03	3.74E-03	Styrene
	EU09A	2014	0	0	0	0	0	0	0	0	3.25	3.25	Methylene Chloride
	EU09B	2014	0	0	0	0	0	0.74	0	0	0	0	
	EU10A	2014	0	0	0	0	0	0	0	0	3.25	3.25	Methylene Chloride
	EU10B	2014	0	0	0	0	0	0.74	0	0	0	0	
	EU11A	2014	0	0	0	0	0	0	0	0	3.25	3.25	Methylene Chloride
	EU11B	2014	0	0	0	0	0	0.74	0	0	0	0	
	EU12A	2014	0	0	0	0	0	0	0	0	3.25	3.25	Methylene Chloride
	EU12B	2014	0	0	0	0	0	0.74	0	0	0	0	
Breathing Bag Production Dip Lines	EU08	2011	0	0	0	0	0	0.86	0	0	0	0	
Combustion			0.05	0.21	0.21	0.02	2.81	0.15	2.36	3,391	0.05	0.05	Hexane
Automated Flex Line	EU04C	2011	0	0	0	0	0	0	0	0	4.82	4.82	Methylene Chloride
Seventeen (17) Plastic Scrap Grinding Machines	EU03A through EU03Q	1990	1.42	1.42	1.42	0	0	0	0	0	0	0	
Five (5) Plastic Extruders	EU01A through EU01E	1990	1.54E-03	1.54E-03	1.54E-03	0	0	0.20	0	0	2.78E-04	2.78E-04	Ethylene Vinyl Acetate (EVA)
Seventeen (17) Injection Molding Machines	EU02A through EU02Q	1990	0	0	0	0	0	0.27	0	0	0.22	0.22	Acrylonitrile Butadiene Styrene (ABS)
Resin Storage Silo	EU06	1990	1.19	1.19	1.19	0	0	0	0	0	0	0	
Resin Handling Operations**		1990	4.56	4.56	4.56	0.00	0	0	0	0	0	0	
	Totals		**7.23**	**7.39**	**7.39**	**0.02**	**2.81**	**22.78**	**2.36**	**3,391**	**30.71**	**29.19**	**Methylene Chloride**

Note that with this modification, the one (1) mask production line, identified as EU-07, is being removed. The PTE summary table above does not include EU-07.

**The material handling (movement of resins to molding machines) is expected to have negligible particulate emissions. As a worst case scenario, the insignificant threshold for PM10 emissions (5 lbs/hr or 25 lbs/day) has been used to represent potential PM and PM10 emissions above. PM2.5 = PM10. This determination was made in Part 70 Operating Permit Renewal No. T057-31700-00067, issued on October 31, 2012

			Unlimited Potential to Emit of Modification (tons/year)										
			Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
Process Description / Emission Unit		Year of Construction	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	CO2e	Total HAPs	Worst Single HAP	
Breathing Circuits Manufacturing Assembly Lines	EU09A	2014	0	0	0	0	0	0	0	0	3.25	3.25	Methylene Chloride
	EU09B	2014	0	0	0	0	0	0.74	0	0	0	0	0
	EU10A	2014	0	0	0	0	0	0	0	0	3.25	3.25	Methylene Chloride
	EU10B	2014	0	0	0	0	0	0.74	0	0	0	0	0
	EU11A	2014	0	0	0	0	0	0	0	0	3.25	3.25	Methylene Chloride
	EU11B	2014	0	0	0	0	0	0.74	0	0	0	0	0
	EU12A	2014	0	0	0	0	0	0	0	0	3.25	3.25	Methylene Chloride
	EU12B	2014	0	0	0	0	0	0.74	0	0	0	0	0
Unlimited Potential to Emit of Modification			**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.98**	**0.00**	**0.00**	**13.00**	**13.00**	**Methylene Chloride**

Appendix A: Emission Calculations
Assembly Lines

Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

1. VOC Emissions

Assembly Line ID	Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	**Maximum Usage (lb/hr)	Pounds VOC per Gallon of Material	PTE VOC (lbs/hr)	PTE VOC (lbs/day)	PTE VOC (tons/yr)
EU04A	*Methylene Chloride	--	--	--	--	--	--	0.00
EU04B	Isopropyl Alcohol	6.59	100%	0.59	6.59	0.59	14.16	2.58
EU05A	U.V. Glue	8.84	63.0%	5.69	5.57	3.59	86.06	15.71
EU05B	Plastic Adhesive	6.84	75.0%	6.58E-03	5.13	4.93E-03	1.18E-01	2.16E-02
EU09A	*Methylene Chloride	--	--	--	--	--	--	0.00
EU09B	Isopropyl Alcohol	6.59	100%	0.17	6.59	0.17	4.08	0.74
EU10A	*Methylene Chloride	--	--	--	--	--	--	0.00
EU10B	Isopropyl Alcohol	6.59	100%	0.17	6.59	0.17	4.08	0.74
EU11A	*Methylene Chloride	--	--	--	--	--	--	0.00
EU11B	Isopropyl Alcohol	6.59	100%	0.17	6.59	0.17	4.08	0.74
EU12A	*Methylene Chloride	--	--	--	--	--	--	0.00
EU12B	Isopropyl Alcohol	6.59	100%	0.17	6.59	0.17	4.08	0.74
					Total	**4.86**	**116.66**	**21.29**

*Pursuant to 40 CFR 51.100(s), Methylene Chloride is not a VOC.

**The maximum usage above provided by the source for U.V. Glue and Plastic Adhesive are based on actual 2005 usage and hours of operation. The emission factor was provided by the source and is based upon usage rates.
The maximum usage above provided by the source for Isopropyl Alcohol is based on actual 2005 usage and hours of operation. The 2005 usage for the Isopropyl Alcohol was scaled up to 8,760 hours/yr but was not multiplied by a safety factor.

Methodology
PTE VOC (lbs/hr) = Maximum Usage (lb/hr) x Weight % Volatile
PTE VOC (lbs/day) = PTE VOC (lbs/hr) x 24 hrs/day
PTE VOC (tons/yr) = PTE VOC (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

2. HAP Emissions

Assembly Line ID	Material	Density (lbs/gal)	**Maximum Usage (lb/hr)	Weight % Methylene Chloride	Weight % Styrene	Weight % Acrylic Acid	PTE Methylene Chloride (tons/yr)	PTE Styrene (tons/yr)	PTE Acrylic Acid (tons/yr)
EU04A	Methylene Chloride	11.0	2.60	100%	0.00%	0.00%	11.37	0.00	0.00
EU04B	Isopropyl Alcohol*	6.59	0.59	0.00%	0.00%	0.00%	0.00	0.00	0.00
EU05A	U.V. Glue	8.84	5.69	0.00%	0.00%	5.00%	0.00	0.00	1.25
EU05B	Plastic Adhesive	6.84	6.58E-03	0.00%	13.0%	0.00%	0.00	3.74E-03	0.00
EU09A	Methylene Chloride	11.0	0.742	100%	0.00%	0.00%	3.25	0.00	0.00
EU09B	Isopropyl Alcohol	6.59	0.17	0.00%	0.00%	0.00%	0.00	0.00	0.00
EU10A	Methylene Chloride	11.0	0.742	100%	0.00%	0.00%	3.25	0.00	0.00
EU10B	Isopropyl Alcohol	6.59	0.17	0.00%	0.00%	0.00%	0.00	0.00	0.00
EU11A	Methylene Chloride	11.0	0.742	100%	0.00%	0.00%	3.25	0.00	0.00
EU11B	Isopropyl Alcohol	6.59	0.17	0.00%	0.00%	0.00%	0.00	0.00	0.00
EU12A	Methylene Chloride	11.0	0.742	100%	0.00%	0.00%	3.25	0.00	0.00
EU12B	Isopropyl Alcohol	6.59	0.17	0.00%	0.00%	0.00%	0.00	0.00	0.00
						Total	**24.37**	**3.74E-03**	**1.25**
						Total HAPs	**25.62**		

*Isopropyl Alcohol is not a HAP
**The maximum usage above provided by the source for U.V. Glue and Plastic Adhesive are based on actual 2005 usage and hours of operation. The emission factor was provided by the source and is based upon usage rates.
The maximum usage above provided by the source for Methylene Chloride and Isopropyl Alcohol is based on actual 2005 usage and hours of operation. The 2005 usage for the Methylene Chloride and Isopropyl Alcohol was scaled up to 8,760 hours/yr but was not multiplied by a safety factor.

Methodology
PTE HAP (tons/yr) = Maximum Usage (lb/hr) x Weight % HAP x 8,760 hrs/yr x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Two (2) breathing bag production dip lines, (EU-08)

Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

Propolene Glycol (Poly) VOC Emissions:
VOC emissions are also generated at the dip lines. Polypropolene glycol, a VOC, is added to a mixture in coagulant tanks to create latex and neoprene that are used to create the mask "breathing bags". The following calculations were used to determine the VOC emissions from the polypropolene glycol. Based on a maximum usage rate of 1725.0 lbs/yr, the emissions before controls are calculated below:

Methodology:
(Maximum usage rate) lb/yr * 1/2000 ton/lb = tons VOC/yr

1725.0 lb propylene glycol/yr * 1/2000 ton/lb = **0.863** tons VOC/yr

Coagulant Tank Particulate (Part) Emissions:
Dry materials are added when making the neoprene and latex mixtures and the detergent used to make the "breathing bag" rinse. All of the dry materials that do not readily blend with water are added in small amounts or in a manner that generates negligible particulate emissions.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

Units	Heat Input Capacity (MMBtu/hr) per unit	TOTAL Heat Input Capacity (MMBtu/hr)
Boiler	1.04	1.04
Ovens (2)	1.4	2.80
Dryers (6)	0.2	1.20
Water Heater	1.2	1.50

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
6.54	1020	56.2

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.05	0.21	0.21	0.02	2.81	0.15	2.36

*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					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	5.898E-05	3.370E-05	2.106E-03	5.055E-02	9.548E-05	**5.284E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.404E-05	3.089E-05	3.932E-05	1.067E-05	5.898E-05	**1.539E-04**
					Total HAPs	**5.300E-02**
					Worst HAP	**5.055E-02**

Methodology is the same as above.

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

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,370	0.1	0.1
Summed Potential Emissions in tons/yr	3,370		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	3,390		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	3,391		

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) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).
CO2e (tons/yr) based on 10/30/2009 federal GWPs = 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).

Appendix A: Emission Calculations
Automated Flex Line

Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

One (1) automated flex line (EU04C)

Material	Maximum Usage Rate (lb/hour)	Transfer Efficiency	Potential Methylene Chloride (HAP) (ton/yr)	Particulate Potential (ton/yr)
Methylene Chloride	1.1	100%	4.82	-

Methylene Chloride Emissions (ton/yr) = Maximum Usage Rate (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

*Pursuant to 40 CFR 51.100(s), Methylene Chloride is not a VOC.

Appendix A: Emission Calculations
Scrap Grinding (EU03A through EU03Q)

Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

Emission Unit	Total Maximum Potential Throughput of Injection Machines (tons/yr)	Total Maximum Potential Throughput of Injection Machines (lbs/hr)	Emission Factor (lbs Particulate/lbs of material processed)	PTE PM/PM10 (lbs/hr/unit)	PTE PM/PM10 (tons/yr/unit)	Total PTE PM/PM10 (tons/yr)
Scrap Grinding Units EU03A through EU03Q (17 units)	1,431	327	9.96E-04	0.02	0.08	1.42

The scrap grinding machines are used to grind the excess material (called "runner") that is removed from finished parts. Material is manually collected from the grinders for reuse in the injection molding machines.

The emission factor is based on the Regrind Resin Loss Study (May 16, 2007) provided by the source on June 5, 2007. The study was completed at this source on May 16, 2007. The source used mass balance to compare the amount of material processed in a grinder to the amount of material collected from the grinder for reuse. The difference in these amounts is the potential particulate emissions.

Methodology
PTE PM/PM10 (lbs/hr/unit) = Total Maximum Potential Throughput of Injection Machines (lbs/hr) x Emission Factor (lbs Particulate/lbs of material processed) x 1 source/17 units
PTE PM/PM10 (tons/yr/unit) = PTE PM/PM10 (lbs/hr/unit) x 8,760 hrs/yr x 1 ton/2,000 lbs
Total PTE PM/PM10 (tons/yr) = PTE PM/PM10 (tons/yr/unit) x 17 units

Appendix A: Emission Calculations
Extrusion (EU01A through EU01E)

Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

Emission Unit	Resin	2005 Throughput Rate (tons/yr)	2005 Hours of Operation	2005 Percent (%) Utilization	Maximum Potential Throughput* (tons/yr)	Maximum Potential Throughput* (tons/hr)	PM/PM10 Emission Factor (lbs/ton)	PTE PM/PM10 (tons/yr)	VOC Emission Factor (lbs/ton)	PTE VOC (tons/yr)	HAPs Emission Factor (lbs/ton)	Total PTE HAPs (tons/yr)
Extruding Machines EU01A through EU01E	Ethylene Vinyl Acetate (EVA 15%)	927	6,240	84.4%	1,542	0.18	2.00E-03	1.54E-03	0.26	0.20	3.60E-04	2.78E-04

The worst case resin extruded is Ethylene Vinyl Acetate (EVA 15%). The emission factors shown above are for EVA 18%.

The emission factors are from an Air & Waste Management Association Paper:
"Development of Emission Factors for Ethylene-Vinyl Acetate and Ethylene-Methyl Acrylate Copolymer Processing" October 1997

*The 2005 actual throughput was 927 tons/yr at 84.4% machine utilization for 6,240 hrs/yr. IDEM adjusted actual production to a realistic upper bound rate of production by extrapolating machine production to 100% utilization and annual operating hours to 8,760 hrs/yr.

Methodology
Maximum Potential Throughput (tons/yr) = 2005 Throughput Rate (tons/yr) / 2005 Percent Utilization (%) x 1/2005 Hours of Operation x 8760 hrs/yr
Maximum Potential Throughput (tons/hr) = Maximum Potential Throughput (tons/yr) x 1 yr/8760 hrs
PTE (tons/yr) = Maximum Throughput Rate (tons/hr) x Emission Factor (lbs/ton) x 8,760 hrs/yr x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Seventeen (17) plastic injection molding machines, (EU02A through EU02Q)

Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

Emission Unit	Resin	2005 Throughput Rate (tons/yr)	2005 Hours of Operation	2005 Percent Utilization (%)	Maximum Potential Throughput* (tons/yr)	Maximum Potential Throughput* (tons/hr)	VOC Emission Factor (lbs/ton)	PTE VOC (tons/yr)	HAPs Emission Factor (lbs/ton)	Total PTE HAPs (tons/yr)
Injection Molding Machines EU02A through EU02Q	Acrylonitrile Butadiene Styrene (ABS)	796	6,240	78.1%	1,431	0.16	0.38	0.27	0.31	0.22

The worst case resin used for injection molding is Acrylonitrile Butadiene Styrene (ABS).

The VOC and HAP emission factors are from an Air & Waste Management Association Paper:
"Sampling and Analysis of Volatile Organic Compounds Evolved during Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins"
September 1995

The PM/PM10 emission factor is from Appendix A of the TSD for permit #177-12874-00065 issued April 3, 2003 for extrusion molding (a similar process).

*The 2005 actual throughput was 796 tons/yr at 78.1% machine utilization for 6,240 hrs/yr. IDEM adjusted actual production to a realistic upper bound rate of production by extrapolating machine production to 100% utilization and annual operating hours to 8,760 hrs/yr.

Methodology
Maximum Potential Throughput (tons/yr) = 2005 Throughput Rate (tons/yr) / 2005 Percent Utilization (%) x 1/2005 Hours of Operation x 8760 hrs/yr
Maximum Potential Throughput (tons/hr) = Maximum Potential Throughput (tons/yr) x 1 yr/8760 hrs
PTE (tons/yr) = Maximum Throughput Rate (tons/hr) x Emission Factor (lbs/ton) x 8,760 hrs/yr x 1 ton/2,000 lbs

Appendix A: Emission Calculations
One (1) resin storage silo, EU06

Company Name: King Systems Corporation
Address: 15011 Herriman Boulevard, Noblesville, Indiana 46060
Significant Source Modification No.: 057-34164-00067
Significant Permit Modification No.: 057-34175-00067
Reviewer: Sarah Street

Emission Unit	Maximum Potential Throughput* (tons/yr)	Maximum Potential Throughput (tons/hr)	PM/PM10 Emission Factor (lbs/ton)	PTE PM/PM10 (tons/yr)
Storage Silo	2,973	0.34	0.80	1.19

The emission factor is from AP-42, Chapter 6.6.2, Table 6.6.2-2 [9/91; reformatted 1/95].
According to AP-42, Chapter 6.6.2, Table 6.6.2-1, footnote f, the estimated particulate emission rate without controls is 0.4 grams per kilogram of product.

*The maximum potential throughput above represents the total maximum throughput of the injection molding and the extrusion machines.

Methodology
PTE PM/PM10 (tons/yr) = Maximum Throughput Rate (tons/hr) x PM/PM10 Emission Factor (lbs/ton) x 8,760 hrs/yr x 1 ton/2,000 lbs

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

March 10, 2014

Mr. Kevin Gould
King Systems Corporation
15011 Herriman Boulevard
Noblesville, IN 46060

Re: Public Notice
King Systems Corporation
Permit Level: Significant Source Modification
And Significant Permit Modification to a
Part 70 Operating Permit
Permit Number: 057-34164-00067 and
057-34175-00067

Dear Mr. Gould:

Enclosed is a copy of your draft Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

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

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that The Times in Noblesville, Indiana publish this notice no later than March 12, 2014.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Sarah Street, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-8427 or dial (317) 232-8427.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

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

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

March 7, 2014

The Times
Stu Clampitt
641 Westfield Road
Noblesville, IN 46060

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for King Systems Corporation, Hamilton County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than March 12, 2014.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1003, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Significant Source Modification and Significant Permit Modification
To a Part 70 Operating Permit
Permit Number: 057-34164-00067 and 057-34175-00067

Enclosure
PN Newspaper.dot 6/13/2013

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

March 10, 2014

To: Noblesville Southeastern Public Library

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

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

Applicant Name: King Systems Corporation
Permit Number: 057-34164-00067 and 057-34175-00067

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

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

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

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

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

Enclosures
PN Library.dot 6/13/2013

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

March 10, 2014
King Systems Corporation
057-34164-00067 and 057-34175-00067

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 6/13/13

Mail Code 61-53

IDEM Staff	VHAUN 3/10/2014 King Systems Corporation 057-34164 and 34175-00067 DRAFT		
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**

AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Kevin Gould King Systems Corporation 15011 Herriman Boulevard Noblesville IN 46060 (Source CAATS)									
2		Steve Davis CEO King Systems Corporation 15011 Herriman Boulevard Noblesville IN 46060 *(RO CAATS)*									
3		Noblesville City Council and Mayors Office 16 S. 10th St. Noblesville IN 46060 *(Local Official)*									
4		Hamilton County Health Department 18030 Foundation Dr. #A Noblesville IN 46060-5405 *(Health Department)*									
5		Hamilton County Board of Commissioners One Hamilton County Square Noblesville IN 46064 *(Local Official)*									
6		Mr. Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 *(Consultant)*									
7		Noblesville Public Library 1 Library Plaza Noblesville IN 46060 *(Library)*									
8		Glidden Fence Co. 17804 Spring Mill Rd Westfield IN 46074 *(Affected Party)*									
9		Environmental Field Services, Inc. 40 SR 32 W Westfield IN 46074 *(Affected Party)*									
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