



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant
DATE: April 17, 2014
RE: P-Americas LLC Austin / 143-34186-00020
FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FN-REGIS.dot 6/13/2013



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REGISTRATION OFFICE OF AIR QUALITY

**P-Americas LLC Austin
1402 State Road 256
Austin, Indiana 47102**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R143-34186-00020	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 17, 2014

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary soft drink manufacturing and bottling plant.

Source Address:	1402 State Road 256, Austin, Indiana 47102
General Source Phone Number:	317-876-6918
SIC Code:	2086
County Location:	Scott County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired boiler, identified as EU1, constructed in 1979, with a maximum capacity of 13.39 MMBtu/hr, and exhausting to stack S-01.
- (b) Three (3) natural gas-fired air heaters, identified as EU2-EU4, constructed in 2003, 2003, and 1994, with a maximum capacity of 0.75, 1.25, and 1.25 MMBtu/hr, and exhausting to stacks S02, S03, and S04, respectively.
- (c) Two (2) natural gas-fired engineering heaters, identified as EU5 and EU6, both constructed in 1994, with a maximum capacity of 0.90 MMBtu/hr, each, and exhausting to stacks S05 and S06, respectively.
- (d) Two (2) natural gas-fired Reznor heaters, identified as EU8 and EU9, both constructed in 2002, with a maximum capacity of 0.08 MMBtu/hr, each, and exhausting to stacks S08 and S09, respectively.
- (e) One (1) natural gas-fired Dunham-Bush heater, identified as EU10, constructed in 1998, with a maximum capacity of 0.21 MMBtu/hr, and exhausting to stack S10.
- (f) One (1) natural gas-fired Armstrong water heater, identified as EU11, constructed in 2006, with a maximum capacity of 3.0 MMBtu/hr, and exhausting to stack S11.
- (g) Two (2) natural gas-fired Quickwater heaters, identified as EU12 and EU13, constructed in 2006 and 2003, with a maximum capacity of 2.50 and 1.75 MMBtu/hr, and exhausting to stacks S12 and S13, respectively.
- (h) Two (2) natural gas-fired GC Evans heaters, identified as EU14 and EU15, both constructed in 2002, with a maximum capacity of 2.50 MMBtu/hr, each, and exhausting to stacks S14 and S15, respectively.
- (i) Thirteen (13) inkjet printers, identified as follows:
 - (1) One (1) printer, identified as EU22, with a print speed of 1,250 feet per minute, constructed in 2013.
 - (2) One (1) printer, identified as EU23, with a print speed of 1,200 feet per minute, constructed in 2013.

- (3) Two (2) printers, identified as EU24 and EU25, with a print speed of 800 feet per minute, each, both constructed in 2005.
 - (4) One (1) printer, identified as EU26, with a print speed of 40 feet per minute, constructed in 2002.
 - (5) One (1) printer, identified as EU27, with a print speed of 150 feet per minute, constructed in 2002.
 - (6) One (1) printer, identified as EU28, with a print speed of 140 feet per minute, constructed in 2002.
 - (7) One (1) printer, identified as EU29, with a print speed of 38 feet per minute, constructed in 2002.
 - (8) One (1) printer, identified as EU30, with a print speed of 50 feet per minute, constructed in 1997.
 - (9) One (1) printer, identified as EU31, with a print speed of 60 feet per minute, constructed in 1997.
 - (10) One (1) printer, identified as EU32, with a print speed of 12 feet per minute, constructed in 1994.
 - (11) Two (2) printers, identified as EU33 and EU34, both constructed in 1994.
- (j) Hot Melt Labeling Operations, with a total maximum usage of 125 gallons of glue per year, constructed in 2002.
- (k) Three (3) Cooling Towers, identified as EU17, EU18, and EU19, with a recirculation rate of 580, 580, and 2,320 gallons per minute, respectively, all three constructed in 2002.
- (l) One (1) Bottle Filling Line, with a maximum capacity of 375 units/minute, including manual cleaning, manual line lubrication and CO₂ filling, constructed in 2005.
- (m) Two (2) Can Filling Lines, with a maximum capacity of 1,250 and 1,200 units/minute, respectively, including manual cleaning, manual line lubrication and CO₂ filling, constructed in 1990.
- (n) Two (2) BIB Filling Lines, with a maximum capacity of 9 units/minute, each, including manual cleaning, manual line lubrication and CO₂ filling, constructed in 2002.
- (o) Two (2) used oil above ground storage tanks, identified as EU20 and EU21, with capacities of 500 and 250 gallons, respectively, both constructed in 1997.

SECTION B

GENERAL CONDITIONS

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

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

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. R143-34186-00020 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

Indianapolis, IN 46204-2251

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

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant shall implement the PMPs.

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

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

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) natural gas-fired boiler, identified as EU1, constructed in 1979, with a maximum capacity of 13.39 MMBtu/hr, and exhausting to stack S-01.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Emission Limitations [326 IAC 6-2-3(a) and (e)]

Pursuant to 326 IAC 6-2-3(e), particulate emissions shall not exceed 0.6 lb/MMBtu heat input.

SECTION D.2

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (f) One (1) natural gas-fired Armstrong water heater, identified as EU11, constructed in 2006, with a maximum capacity of 3.0 MMBtu/hr, and exhausting to stack S11.
- (g) Two (2) natural gas-fired Quickwater heaters, identified as EU12 and EU13, constructed in 2006 and 2003, with a maximum capacity of 2.50 and 1.75 MMBtu/hr, and exhausting to stacks S12 and S13, respectively.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.2.1 Particulate Emission Limitations [326 IAC 6-2-4(a)]

- (a) Pursuant to 326 IAC 6-2-4(a), particulate emissions from emission unit EU13 shall not exceed 0.54 lb/MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4(a), particulate emissions from emission units EU11 and EU12 shall not exceed 0.50 lb/MMBtu heat input.

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	P-Americas LLC Austin
Address:	1402 State Road 256
City:	Austin, Indiana 47102
Phone Number:	317-876-6918
Registration No.:	R143-34186-0002

I hereby certify that P-Americas LLC Austin is :

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. R143-34186-00020.
- not in compliance with the requirements of Registration No. R143-34186-00020.

I hereby certify that P-Americas LLC Austin is :

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

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

Noncompliance:

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

Technical Support Document (TSD) for an Exemption Transitioning to a
Registration

Source Description and Location

Source Name: P-Americas LLC Austin
Source Location: 1402 State Road 256, Austin, Indiana 47102
County: Scott
SIC Code: 2086
Registration No.: R143-34186-00020
Permit Reviewer: Daniel W Pell

On February 14, 2014, the Office of Air Quality (OAQ) received an application from P-Americas LLC Austin related to the operation of an existing plant.

Existing Approvals

The source was issued an Exemption No. 143-29809-00020, on November 24, 2010.

County Attainment Status

The source is located in Scott County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, 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.
P _b	Unclassifiable or attainment effective December 31, 2011.

¹Unclassifiable 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. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) **PM_{2.5}**

Scott County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) **Other Criteria Pollutants**

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

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by P-Americas LLC Austin on February 14, 2014, relating to a Registration.

The source consists of the following existing emission units:

- (a) One (1) natural gas-fired boiler, identified as EU1, constructed in 1979, with a maximum capacity of 13.39 MMBtu/hr, and exhausting to stack S-01.
- (b) Three (3) natural gas-fired air heaters, identified as EU2-EU4, constructed in 2003, 2003, and 1994, with a maximum capacity of 0.75, 1.25, and 1.25 MMBtu/hr, and exhausting to stacks S02, S03, and S04, respectively.
- (c) Two (2) natural gas-fired engineering heaters, identified as EU5 and EU6, both constructed in 1994, with a maximum capacity of 0.90 MMBtu/hr, each, and exhausting to stacks S05 and S06, respectively.
- (d) Two (2) natural gas-fired Reznor heaters, identified as EU8 and EU9, both constructed in 2002, with a maximum capacity of 0.08 MMBtu/hr, each, and exhausting to stacks S08 and S09, respectively.
- (e) One (1) natural gas-fired Dunham-Bush heater, identified as EU10, constructed in 1998, with a maximum capacity of 0.21 MMBtu/hr, and exhausting to stack S10.
- (f) One (1) natural gas-fired Armstrong water heater, identified as EU11, constructed in 2006, with a maximum capacity of 3.0 MMBtu/hr, and exhausting to stack S11.
- (g) Two (2) natural gas-fired Quickwater heaters, identified as EU12 and EU13, constructed in 2006 and 2003, with a maximum capacity of 2.50 and 1.75 MMBtu/hr, and exhausting to stacks S12 and S13, respectively.
- (h) Two (2) natural gas-fired GC Evans heaters, identified as EU14 and EU15, both constructed in 2002, with a maximum capacity of 2.50 MMBtu/hr, each, and exhausting to stacks S14 and S15, respectively.
- (i) Thirteen (13) inkjet printers, identified as follows:
 - (1) One (1) printer, identified as EU22, with a print speed of 1,250 feet per minute, constructed in 2013.
 - (2) One (1) printer, identified as EU23, with a print speed of 1,200 feet per minute, constructed in 2013.
 - (3) Two (2) printers, identified as EU24 and EU25, with a print speed of 800 feet per minute, each, both constructed in 2005.
 - (4) One (1) printer, identified as EU26, with a print speed of 40 feet per minute, constructed in 2002.

- (5) One (1) printer, identified as EU27, with a print speed of 150 feet per minute, constructed in 2002.
 - (6) One (1) printer, identified as EU28, with a print speed of 140 feet per minute, constructed in 2002.
 - (7) One (1) printer, identified as EU29, with a print speed of 38 feet per minute, constructed in 2002.
 - (8) One (1) printer, identified as EU30, with a print speed of 50 feet per minute, constructed in 1997.
 - (9) One (1) printer, identified as EU31, with a print speed of 60 feet per minute, constructed in 1997.
 - (10) One (1) printer, identified as EU32, with a print speed of 12 feet per minute, constructed in 1994.
 - (11) Two (2) printers, identified as EU33 and EU34, both constructed in 1994.
- (j) Hot Melt Labeling Operations, with a total maximum usage of 125 gallons of glue per year, constructed in 2002.
- (k) Three (3) Cooling Towers, identified as EU17, EU18, and EU19, with a recirculation rate of 580, 580, and 2,320 gallons per minute, respectively, all three constructed in 2002.
- (l) One (1) Bottle Filling Line, with a maximum capacity of 375 units/minute, including manual cleaning, manual line lubrication and CO₂ filling, constructed in 2005.
- (m) Two (2) Can Filling Lines, with a maximum capacity of 1,250 and 1,200 units/minute, respectively, including manual cleaning, manual line lubrication and CO₂ filling, constructed in 1990.
- (n) Two (2) BIB Filling Lines, with a maximum capacity of 9 units/minute, each, including manual cleaning, manual line lubrication and CO₂ filling, constructed in 2002.
- (o) Two (2) used oil above ground storage tanks, identified as EU20 and EU21, with capacities of 500 and 250 gallons, respectively, both constructed in 1997.

Enforcement Issues

IDEM is aware that equipment has been operation prior to obtaining a Registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the Registration rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
NG Combustion	0.25	1.01	1.01	0.08	13.34	0.73	11.2	16,100	0.25	0.24 Hexane
Inkjet Printers	0.0	0.0	0.0	0.0	0.0	3.27	0.0	0.0	1.32	1.22 Methanol
Line Cleaning & Lubrication	0.0	0.0	0.0	0.0	0.0	3.12	0.0	0.0	0.0	-
Flavoring Process	0.0	0.0	0.0	0.0	0.0	8.05	0.0	0.0	0.0	-
Cooling Towers	0.35	0.35	0.35	0.0	0.0	0.0	0.0	0.0	0.0	-
Hot Melt Labeling	0.0	0.0	0.0	0.0	0.0	0.45	0.0	0.0	0.0	-
Total PTE of Entire Source	0.6	1.4	1.4	0.1	13.3	15.6	11.2	16,100	1.58	1.22 Methanol
Exemptions Levels**	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 100,000	< 25	< 10
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

negl. = negligible
 Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant.
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of NO_x and VOC are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the Registration, for the following units and reasons:
 - (1) The natural gas-fired boiler, identified as EU1 was constructed before the June 9, 1989 applicability date.
 - (2) The natural gas-fired hot water heaters, identified as EU11, EU12, and EU13 each have maximum heat input capacities less than 10 MMBtu/hr.
- (b) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (326 IAC 12), are not included in the Registration, because there are no metal can surface coating operations at this manufacturing facility.
- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the Registration.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The Boiler EU1 is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, Subpart JJJJJ because although it is defined as an industrial boiler at a manufacturing facility located at an area source, it is fired by natural gas.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Cans, Subpart KKKK, are not applicable to this Registration because there are no metal can surface coating operations at this manufacturing facility.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ (326 IAC 20), are not included for this Registration, since this source is not a major source for HAPs.
- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the Registration.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) **326 IAC 2-5.1-2 (Registrations)**
Registration applicability is discussed under the Permit Level Determination – Registration section above.

- (b) **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) **326 IAC 2-6 (Emission Reporting)**
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) **326 IAC 5-1 (Opacity Limitations)**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this Registration:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) **326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)**
Pursuant to 326 IAC 6-2-3 (Particulate Limitations for Sources of Indirect Heating) particulate emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

$$C = 50 \text{ u/m}^3$$

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks (1)

a = plume rise factor (0.67)

h = stack height (ft) (31)

For natural gas-fired boiler, EU1 (constructed in 1979) the PM emissions shall be limited to the pounds per million British Thermal Units heat input (lb/MMBtu) as calculated below:

$$Q = 13.39 \text{ MMBtu/hr}$$

$$\text{Pt for EU1} = 1.93 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating purposes which has 250 mmBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/mmBtu heat input.

Using the emission factors and heating values provided, the following conclusion can be made:

$$\text{Particulate Matter (PM) Emissions} = 1.9 \text{ lb PM/MM SCF} \times \text{MM SCF} / 1,020 \text{ MMBtu}$$

$$= 0.0019 \text{ lbs/MMBtu}$$

The 0.0019 lbs/MMBtu emission rate estimated using the AP-42 emission factor is less than the 0.6 lb/MMBtu limit.

Therefore, the boiler EU1 is able to comply with 326 IAC 6-2-3(a) and (e).

- (f) **326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**
 Pursuant to 326 IAC 6-2-4(a) (Particulate Limitations for Sources of Indirect Heating) particulate emissions from indirect heating facilities existing and in operation after September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British Thermal Units.

Q = Total source maximum operating capacity rating in million British Thermal Units heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

For natural gas-fired HW Heaters EU13, EU11, and EU12, the PM emissions shall be limited to the pounds per million British Thermal Units heat input (lb/MMBtu) as calculated below:

Year of Construction	Unit ID	Maximum Heat Input Capacity (MMBtu/hr)	Total Maximum Source Q (based on Year of Construction)(MMBtu/hr)	Calculated Particulate Limits, Pt (lb/MMBtu)
1979	Boiler EU1	13.39	13.39	1.93
2003	HW Heater EU13	1.75	15.14	0.54
2006	HW Heater EU11	3.0	20.64	0.50
	HW Heater EU12	2.5		

$$Q1 = Q (1979) + Q (2003)$$

$$Q1 = 13.39 + 1.75 = 15.14$$

Pt for EU13 = 0.54 lb/MMBtu

$$Q2 = Q (1979) + Q (2003) + Q (2006)$$

$$Q2 = 20.64 \text{ MMBtu/hr}$$

Pt for EU11 and EU12 = 0.50 lb/MMBtu

The following calculation represents the ability of the source to comply with this limit when using natural gas:

Using the emission factors and heating values provided, the following conclusion can be made:

$$\begin{aligned} \text{Particulate Matter (PM) Emissions} &= 1.9 \text{ lb PM/MM SCF} \times \text{MM SCF} / 1,020 \text{ MMBtu} \\ &= 0.0019 \text{ lbs/MMBtu} \end{aligned}$$

The 0.0019 lbs/MMBtu emission rate estimated using the AP-42 emission factor is less than 0.54 lb/MMBtu and 0.50 lb/MMBtu limits.

Therefore, the HW Heaters EU11, EU12, and EU13, are able to comply with 326 IAC 6-2-4(a).

- (g) **326 IAC 6-4 (Fugitive Dust Emissions Limitations)**
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (i) **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (j) **326 IAC 8-2-3 (VOC Rules: Can Coating Operations)**
The source is not subject to the requirements of 326 IAC 8-2-3, because there are no metal can surface coating operations at this manufacturing facility. Therefore, 326 IAC 8-2-3 does not apply.
- (k) **326 IAC 8-3-2 (VOC Rules: Organic Solvent Degreasing Operations)**
The source is not subject to the requirements of 326 IAC 8-3-2, because there are no organic solvent degreasing operations at this manufacturing facility. Therefore, 326 IAC 8-3-2 does not apply.
- (l) **326 IAC 12 (New Source Performance Standards)**
See Federal Rule Applicability Section of this TSD.
- (m) **326 IAC 20 (Hazardous Air Pollutants)**
See Federal Rule Applicability Section of this TSD.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 14, 2014.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. R143-34186-00020. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed Registration can be directed to Daniel W Pell at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-8532 or toll free at 1-800-451-6027 extension 4-8532..
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emission Calculations
Summary of PTE for Entire Source**

Company Name: P-Americas LLC
Address City IN Zip: 1402 State Road 256, Austin, Indiana 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell

	Uncontrolled PTE (tons/year)										
	PM	PM-10	PM-2.5	SO ₂	No _x	VOC	CO	GHG as CO ₂ e	Total HAP	Worst Case HAP	
NG Combustion Units	0.25	1.01	1.01	0.08	13.34	0.73	11.20	16100	0.25	0.24	Hexane
Inkjet Printers	0.0	0.0	0.0	0.0	0.0	3.27	0.0	0.0	1.32	1.22	Methanol
Line Cleaning & Lubrication	0.0	0.0	0.0	0.0	0.0	3.12	0.0	0.0	0.0	0.0	-
Flavoring Process	0.0	0.0	0.0	0.0	0.0	8.05	0.0	0.0	0.0	0.0	-
Cooling Towers	0.35	0.35	0.35	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-
Hot Melt Labelling	0.0	0.0	0.0	0.0	0.0	0.45	0.0	0.0	0.0	0.0	-
Total	0.6	1.4	1.4	0.1	13.3	15.6	11.2	16,100	1.58	1.22	Methanol

**Appendix A: Emissions Calculations
Heaters, Water Heaters, and Boiler - Combustion PTE
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell

Unit ID	Quantity	MMBtu/hr (each)	Total MMBtu/hr
EU1	1	13.39	13.39
EU2	1	0.75	0.75
EU3 & EU4	2	1.25	2.5
EU5 & EU6	2	0.9	1.8
EU8 & EU9	2	0.08	0.16
EU10	1	0.21	0.21
EU11	1	3.0	3.0
EU12	1	2.5	2.5
EU13	1	1.75	1.75
EU14 & EU15	2	2.5	5.0
TOTAL			31.06

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
31.06	1020	266.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.25	1.01	1.01	0.08	13.34	0.73	11.20

*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

See Page 3 for continuation

**Appendix A: Emissions Calculations
Heaters, Water Heaters, and Boiler - Combustion PTE
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell

HAPS Calculations

HAPs - Organics						
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics
Potential Emission in tons/yr	2.801E-04	1.601E-04	1.000E-02	2.401E-01	4.535E-04	2.510E-01

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals
Potential Emission in tons/yr	6.669E-05	1.467E-04	1.867E-04	5.068E-05	2.801E-04	7.309E-04

Total HAPs	2.517E-01
Worst HAP	2.401E-01

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.

See Page 4 for continuation

**Appendix A: Emissions Calculations
Heaters, Water Heaters, and Boiler - Combustion PTE
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell**

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	16,005	0.3	0.3
Summed Potential Emissions in tons/yr	16,006		
CO2e Total in tons/yr	16,100		

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).

**Appendix A: Emission Calculations
Cooling Tower - PM PTE ***

Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell

*Calculation Sheet provided by source and approved by IDEM.

UNIT ID	Circulating Fow Rate (gpm)	Total Drift (% of circulating flow)	Total Dissolved Solids (PPM)	PM Emissions (tons/yr)
EU 17	580.0	0.005	969	0.06
EU 18	580.0	0.005	841	0.05
EU 19	2,320.0	0.005	921	0.23
Total PM Emissions (tpy)				0.35

METHODOLOGY

PM Emissions (tons/yr) = Circulating Flow Rate (gal/min) x (60 min/hr) x Total Drift(%) x Density (8.3454 lb/gal) x Total Dissolved Solids (ppm)
 8760 hr/year x (1 ton/2000 lbs)

**Appendix A: Emission Calculations
Flavoring Emissions PTE ***

Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell

*Calculation Sheet provided by source and approved by IDEM.

Annual Production (gallons/year)	Maximum Production (gallons/year)	VOC Emission Factor (lb/gal)	Actual VOC Emissions (ton/yr)	Potential VOC Emissions (ton/yr)
119,529,749	294,712,235	2.73053E-05	3.26	8.05

METHODOLOGY

VOC Emissions (ton/yr) = Maximum Production (gal/yr) x Emission Factor (lb/gal) x (1 ton/2000 lbs) x (2 filling events)

VOC emissions are based on two filling events.

Emission Factor was determined using Equation 11 as shown in the NESHAP, Subpart GGG, National Emission Standards for Pharmaceuticals Production.

$$E = \frac{(V)}{(R)(T)} \times \sum_{i=1}^n (P_i)(MW_i) \quad (Eq. 11)$$

E = mass of VOC emitted; V = volume of gas displaced from the vessel; R = ideal gas constant; T = absolute temperature of vessel vapor space;
 Pi = partial pressure of individual VOC; MWi = molecular weight of individual VOC; n= number of VOC compounds in the emission stream; i = identifier for a VOC compound.

**Appendix A: Emission Calculations
Hot Melt Adhesive - VOC PTE ***

Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell

*Calculation Sheet provided by source and approved by IDEM.

Material	Actual Usage (gal/yr)	Maximum Usage (gal/yr)	VOC Emission Factor (lb/gal)	Actual VOC Emissions (ton/yr)	Potential VOC Emissions (ton/yr)
Technomelt Cool 250F	528.56	1303.21	0.00	0.00	0.00
Technomelt EM 377	494.72	1219.79	0.01	0.00	0.01
Melt-O-Clean	50.78	125.21	7.09	0.18	0.44
Technomelt 8368	1057.11	2606.42	0.00	0.00	0.00
Technomelt 8370	3523.71	8688.05	0.00	0.00	0.00
Technomelt 200F Easy-Pac	17442.37	43005.87	0.00	0.00	0.00
TOTAL				0.18	0.45

METHODOLOGY

PTE VOC Emissions (ton/yr) = Maximum Usage (gal/yr) x VOC Emission Factor (lb/gal) x (1 ton/2000 lbs).
 Maximum Usage was determined by using a ratio of actual production volumes to potential production volumes.

**Appendix A: Emission Calculations
Inkjet Printers Emissions - VOC PTE ***

**Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell**

*Calculation Sheet provided by source and approved by IDEM.

Material	Actual Usage (gal/yr)	Maximum Usage (gal/yr)	VOC (lb/gal)	Actual VOC Emissions (ton/yr)	Potential VOC Emissions (ton/yr)
Make-Up Fluid V705-D	9.51	23.45	6.61	0.03	0.08
Make-Up Fluid 16-8605	249.75	615.78	6.61	0.83	2.04
Ink V410-D	4.76	11.72	5.03	0.01	0.03
Ink 16-8600	31.50	77.67	5.79	0.09	0.22
Ink M512	1.60	3.95	0.51	0.00	0.00
MC-291BK MakeUp	14.82	36.54	7.51	0.06	0.14
IR-291BK Printing Ink	10.46	25.79	7.16	0.04	0.09
IM-601BK-2 Printing Ink	52.31	128.97	0.00	0.00	0.00
Cleaning Solution V901-Q	1.59	3.92	6.61	0.01	0.01
WL-200 Wash	4.50	11.10	6.67	0.02	0.04
Make-Up 16-8530Q	33.75	83.21	5.45	0.09	0.23
Make-Up 16-8535Q	20.25	49.93	6.61	0.07	0.17
Make-Up 16-8205Q	24.75	61.02	6.61	0.08	0.20
Make-Up 16-8200Q	4.50	11.10	5.18	0.01	0.03
TOTAL				1.33	3.27

METHODOLOGY

MSDS provided by source.

PTE VOC Emissions (ton/yr) = Maximum Usage (gal/yr) x VOC (lb/gal) x (1 ton/2000 lbs).

Maximum Usage was determined by using a ratio of actual production volumes to potential production volumes (per

On MSDS: Relative Density (RD) = Specific Gravity (SG); (VOC Volatility (w/w), %) indicated on MSDS.

Substance Density (lb/gal) = (RD) * (Water Density, lb/gal) = (RD) * (8.34 lb/gal)

VOC (lb/gal) = Substance Density (lb/gal) * (VOC Volatility or Content, %)

**Appendix A: Emission Calculations
HAP PTE from Inkjet Printers**

just tes

Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell

Potential HAP Emissions from Inkjet Materials

Material	Density (lb/gal)	Maximum Usage (gal/yr)	Wt % Methanol	Wt % Ethylene Glycol	Methanol Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Total Emissions (ton/yr)
Make-Up Fluid 16-8605	6.68	615.78	50.00%	0.00%	1.03	0.00	1.03
IM-601BK-2 Printing Ink	8.14	128.97	0.00%	20.00%	0.00	0.10	0.10
Ink 16-8600	7.43	77.67	30.00%	0.00%	0.09	0.00	0.09
Make-Up 16-8205Q	6.68	61.02	45.00%	0.00%	0.09	0.00	0.09
Make-Up 16-8200Q	7.51	11.10	30.00%	0.00%	0.01	0.00	0.01
Total					1.22	0.10	1.32

Worst Case HAP Emission (tons/yr) **1.22**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Maximum Usage (gal/yr) * Weight % HAP * 1 ton/2000 lbs
 MSDS inkjet printer materials provided by source.

Appendix A: Emission Calculations
Line Cleaning & Lubrication - VOC PTE *

Company Name: P-Americas LLC Austin
Address City IN Zip: 1402 State Road 256, Austin, IN 47102
Permit Number: R143-34186-00020
Reviewer: Daniel W Pell

*Calculation Sheet provided by source and approved by IDEM.

Material	Actual Usage (gal/yr)	Maximum Usage (gal/yr)	VOC (lb/gal)	Actual VOC Emissions (ton/yr)	Potential VOC Emissions (ton/yr)
Line Cleaning Materials					
Advantis 330	6800.00	16766.06	0.00	0.00	0.00
Lift RT	480.00	1183.49	0.82	0.20	0.49
Octave	925.00	2280.68	0.00	0.00	0.00
Enforce LP	1860.00	4586.01	0.00	0.00	0.00
Foamshine	78.00	192.32	0.00	0.00	0.00
Soil Off II	275.00	678.04	0.27	0.04	0.09
Bevosheen	2102.00	4960.78	0.00	0.00	0.00
Ster Bac	65.00	160.26	0.17	0.01	0.01
RTU Surface	159.00	392.03	4.82	0.38	0.94
EcoWipes	16.07	39.63	0.45	0.00	0.01
Pathways Drain	216.00	532.57	0.00	0.00	0.00
ACC-55-5 Red	35.00	86.30	0.00	0.00	0.00
Crystal Clean 142+ Mineral Spirits	120.00	295.87	8.17	0.49	1.21
Line Lubrication Materials					
DryExx DS	1689.65	4166.00	0.00	0.00	0.00
Lubodrive FC	833.47	2055.00	0.36	0.15	0.37
TOTAL				1.27	3.12

METHODOLOGY

PTE VOC Emissions (ton/yr) = Maximum Usage (gal/yr) x VOC (lb/gal) x (1 ton/2000 lbs).

Maximum Usage was determined by using a ratio of actual production volumes to potential production volumes (per source).



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

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

TO: Chris Leck
P-Americas LLC, Austin
5411 W. 78th Street
Indianapolis, Indiana 46268

DATE: April 17, 2014

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

SUBJECT: Final Decision
Registration
143-34186-00020

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Brad Chastain, Maintenance Manager / P-Americas LLC, Austin
Holly Argiris / ERM
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	AWELLS 4/17/2014 P-Americas LLC Austin IN 143-34186-00020 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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		Chris Leck P-Americas LLC Austin IN 5411 West 78th Street Indianapolis IN 46268 (Source CAATS) confirmed delivery										
2		Brad Chastain Maintenance Manager P-Americas LLC Austin IN 1402 State Road 256 Austin IN 47102 (RO CAATS)										
3		Scott County Health Department 1471 N. Gardner St Scottsburg IN 47170-7751 (Health Department)										
4		Austin Town Council 80 W. Main St. Austin IN 47102 (Local Official)										
5		Holly Argiris Environmental Resources Management (ERM) 11350 N. Meridian, Ste 320 Carmel IN 46032 (Consultant)										
6		Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 47170 (Local Official)										
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